

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

AT

TRIUMPH FOODS

5302 Stockyards Expressway
St. Joseph, MO 64504
(816) 396-2825

EPA ID Number: MOR000522748

ON

May 26, 2009

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Services Division

1.0 INTRODUCTION

At the request of the Air and Waste Management Division (AWMD), I conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Triumph Foods (Triumph) located in St. Joseph, MO, on May 26, 2009. This CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. During the CEI, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This inspection report and attachments present the results of the CEI. This CEI was conducted as a Level B Multi-media Inspection and the *Region 7 Multimedia Screening Checklist* is included as Attachment 1. Based on the information obtained during the course of the inspection, I inspected the facility as a small quantity handler of universal waste, a used oil generator, and a Federal conditionally exempt small quantity generator (CESQG) of hazardous waste.

2.0 PARTICIPANTS

Triumph Foods (Triumph):

Steven Enyart, Safety Manager (5 years at current position)
R. Patt Lilly, Chief Administrative Officer (3 years at current position)
Carl Oyler, Assistant Safety Manager (4 years at current position)
Neil Puetz, Plant Engineer (1½ years at current position)
Rafael Mendoza, Staging Supervisor (1 year at current position)
Chris Latta, Wastewater Supervisor (1½ years at current position)
Terry Gilbert, Health Services Manager (4 years at current position)
Jennifer Bagwell, Lab Manager (4 months at current position)
Corey Smith, Assistant Purchasing Manager (1½ years at current position)

U.S. Environmental Protection Agency (EPA):
Michael J. Martin, Life Scientist

3.0 INSPECTION PROCEDURES

Prior to beginning this inspection, I conducted a visual reconnaissance of Triumph searching for areas of concern observable from the adjacent roadway. I identified no environmental issues or concerns during this preliminary examination. Upon arrival at Triumph at 9:40 a.m., I met with Messrs. Enyart and Lilly. I explained the purpose and procedures of the inspection and presented them with my EPA credentials. Messrs. Enyart and Lilly were made aware of their confidentiality rights and were informed that a Confidentiality Notice would be provided at the end of the inspection to make any claims. Messrs. Enyart and Lilly were provided with a copy of U.S. Federal Code 1001 and 1002 concerning false statements and documents to read. Messrs. Enyart, Lilly, and Oyler acted as the official facility representatives during the course of the CEI.

The inspection consisted of a discussion of facility operations, waste generation and waste management, a review of waste management records, and a visual inspection of the waste generation and management areas. Document photocopies and photographs were additionally collected as inspection documentation (see attachments 1-19 and photos 1-19).

I conducted a visual inspection of the following areas (see attachment 2 for the Facility Layout):

Administrative Building (Safety Office)
Compressor Room
Monfort Building
Wastewater Pretreatment Plant
Staging Area
Personal Protective Equipment (PPE) Room

Health Services (Nursing Station)
Microbiology Lab
East Rendering Bay
Wastewater Pretreatment Lab
Parts Room
Receiving Area

At the conclusion of the inspection, I summarized the findings and recommendations with Messrs. Enyart, Lilly, and Oyler at the exit briefing. I provided Mr. Lilly with a *Confidentiality Notice*, which he signed, indicating no confidentiality claims were made by Triumph (see attachment 3). I provided Mr. Lilly with a *Receipt of Document and Samples*, which he signed as acknowledgement of receipt (see attachment 4). I provided Mr. Lilly with a *Notice of Violation* (see attachment 5), which he signed as acknowledgement of receipt. I requested that Messrs. Enyart and Lilly respond to the issues listed on the *Notice of Violation* in writing, within 14 calendar days.

The following inspection documents and compliance assistance handouts were provided to Triumph:

Receipt for Documents and Samples (Top page of the completed carbon copy set)

Confidentiality Notice (Top page of the completed carbon copy set)

Notice of Violation (Top page of the completed carbon copy set)

Security Awareness (EPA Pamphlet)

Commercial Motor Vehicle Transportation Security Planning (EPA Information Sheet)

U.S EPA Small Business Resources (EPA Fact Sheet)

Supplemental Information for Small Businesses (EPA Fact Sheet)
How to Prepare Hazardous Waste Manifests (EPA Fact Sheet)
Mismanagement of Laboratory Waste (EPA Fact Sheet)
Waste or Product Determination Guidance (MDNR Fact Sheet)
Hazardous Waste Generator Status Guidance (MDNR Fact Sheet)
Hazardous Waste Satellite Accumulation (MDNR Fact Sheet)
Hazardous Waste in Missouri (MDNR Fact Sheet)
Hazardous Waste Satellite Accumulation (MDNR Fact Sheet)
Special Waste (MDNR Fact Sheet)
Solvent-Contaminated Rags (MDNR Fact Sheet)
Aerosol Cans (MDNR Fact Sheet)
The Universal Waste Rule in Missouri (MDNR Fact Sheet)
Fluorescent Lamps (MDNR Fact Sheet)
Fluorescent Lamp Ballasts (MDNR Fact Sheet)
Used Oil Generators (MDNR Fact Sheet)
Used Oil Collection Centers (MDNR Fact Sheet)
Used Oil Burners (MDNR Fact Sheet)
Used Oil Marketers (MDNR Fact Sheet)
Used Oil Contaminated Waste (MDNR Fact Sheet)
Used Oil Processors and Re-Refiners (MDNR Fact Sheet)
Small Quantity Generator Inspection Checklist (MDNR Inspection Checklist)

4.0 FACILITY DESCRIPTION

4.1 Facility Information and Operations

Triumph, located in St. Joseph, MO, is a processor and exporter of premium pork products. Triumph began processing operations in January 2006 and is a producer-owned pork processing company. Triumph processes over 19,000 hogs per day and produces 40,000-45,000 boxes of pork product per day. Triumph is located on 59 acres and has over 700,000 square feet of manufacturing space and office space. Triumph has approximately 2,700 employees and operates 24 hours per day, Monday through Sunday.

Mr. Enyart stated that the hog processing operation is as follows:

1. Live hogs are brought on-site by trailer loads. The live hogs are unloaded and held in a holding area for two to four hours (de-stress period prior to anesthetization).
2. The live hogs are moved to the carbon dioxide anesthetization pit to be anesthetized (chemical stunning method). Stressed hogs are put down with .25 caliber blank rim fire cartridges (mechanical stunning method).
3. The unconscious hogs are then shackled, hoisted, and struck in the jugular veins and carotid arteries by a singular blade knife (blood is allowed to bleed out). Their heads are severed and their hair is removed (de-hairing process in 140°F water and flame singer).
4. The carcasses are then refrigerated for 24 hours.
5. After refrigeration, the carcasses are then cut into unbiased cuts (shoulders, butts, etc.).

6. Any remaining items (viscera, fat, bones, etc.) left on the carcasses are sent to the on-site Rendering Plant (production of blood meal, bone mill grease, animal feed, pet food additives, etc.).
7. The final processed cuts and Rendering Plant products are then shipped off-site to customers.

4.2 RCRA Status

Triumph has not been inspected for RCRA compliance prior to this inspection. According to the EPA RCRA Handler Report, Triumph last submitted information on May 31, 2006 as a Federal small quantity generator of D001 and D002 characteristic hazardous waste (see attachment 6 for the EPA RCRA Handler Report). I asked Mr. Enyart to review the EPA RCRA Handler Report, which I provided to him during the inspection. No changes were noted. From my review of the past three years' hazardous waste summary reports and uniform hazardous waste manifests, it appears that Triumph has never generated over 220 pounds of hazardous waste per month (see attachment 7 for the 2005-2008 Hazardous Waste Summary Report and see attachment 8 for the 2006-2009 Uniform Hazardous Waste Manifests). Based on the information obtained during the course of the inspection, I determined that Triumph is operating as a small quantity handler of universal waste, a used oil generator, and a Federal CESQG of D002, D007, D009, and D011 characteristic hazardous waste.

4.3 Waste Streams and Management

Wastewater and Sludge - Triumph discharges an average of 2,350,000 million gallons of treated wastewater per day to the City of St. Joseph, MO, wastewater collection system (see attachment 9 for the Triumph's Wastewater Contribution Permit). Triumph's wastewater consists of all associated production water used inside the entire plant (wastewater generated from the dehairing process, cutting floor, kill floor, carcass wash, equipment and building structure cleaning /rinsing, rendering cook off water, etc.). Mr. Enyart stated that Triumph's wastewater is treated on-site by an aerobic treatment system. Mr. Enyart stated that ten tanker truck loads (47,000 lbs per tanker) of wastewater sludge is generated per week and is non-hazardous based on analytical report (see attachment 10 for the Wastewater Sludge Analytical Report). From my review of the wastewater sludge analytical report, it appears that Triumph's wastewater sludge is non-hazardous. Triumph has a contract with Terra Renewal Services (TRS), Russellville, AR, to sell their wastewater sludge as fertilizer (see attachment 11 for the TRS's Missouri Fertilizer Permit). I reviewed Triumph's management of their wastewater and sludge and no apparent violations were noted.

Chemical Oxygen Demand (COD) Waste - Triumph uses COD test kits to measure the organic content of their wastewater. Triumph generates an average of 28 pounds of spent COD test solution waste per year (see photo #7). Triumph's COD test solution waste is disposed by Safety-Kleen, Kansas City, MO, as D002, D007, D009, and D011 characteristic hazardous waste. Located at the Wastewater Pretreatment Lab, I observed one 5 gallon container of COD test solution waste labeled with the words "Hazardous Waste" and dated as "March 4, 2009" (see photo #7). I reviewed Triumph's management of their COD waste and no apparent violations were noted.

Spent Rim Fire Cartridges and Spent Rubber Grommets - Triumph uses .25 caliber blank rim fire cartridges to render stressed hogs (see photos #2 and #5). The .25 caliber blank rim fire cartridges are loaded into 2ft. metal captive bolt stunners (see photos #3 and #18). Mr. Mendoza stated that rubber grommets (see photo #4) located inside the captive bolt stunners are replaced often (every shift) to ensure the stunner's effectiveness. Messrs. Mendoza and Enyart stated that Triumph's spent .25 caliber blank rim fire cartridges and spent rubber grommets are both non-hazardous (based on process knowledge) and are disposed in the general trash. Based on my review of the .25 caliber blank rim fire cartridge MSDS, it appears that the spent .25 caliber blank rim fire cartridges are non-hazardous (see attachment 12 for the .25 Caliber Blank Rim Fire Cartridge MSDS). Mr. Enyart stated that the .25 caliber blank rim fire cartridges are not slug power loads. Mr. Enyart stated that the striking of the .25 caliber cartridges causes an explosion and creates a rapidly expanding gas which drives a self retracting "bolt" into the skull of the hog. Mr. Enyart stated that no gun powder or gas penetrates the hogs. Mr. Enyart stated that Triumph uses the captive bolt stunners approximately 80 times a day and generates approximately 1,733 spent .25 caliber blank rim fire cartridges per month. At the time of the inspection, the amount of spent rubber components disposed in the general trash per year was not determined. On June 15, 2009, I spoke to Mr. Enyart (11:10 a.m. - phone conversation) and sent him an email regarding the waste generation and waste management of Triumph's spent rubber components. As of the date of this report, I have not received a response from Mr. Enyart. I reviewed Triumph's current management of their spent .25 caliber blank rim fire cartridges and spent rubber grommets and no apparent violations were noted.

Universal Waste-Lamps - Triumph generates spent fluorescent lamps (4ft. and 8ft. lamps) and spent HID lamps from their re-lamping activities. Mr. Enyart stated that Triumph's spent fluorescent lamps and spent HID lamps are recycled by Safety-Kleen, Kansas City, MO, as universal waste. Triumph generated 50 pounds of universal waste-lamps in the 2007 calendar year and 225 pounds of universal waste-lamps in the 2008 calendar year (see attachments 13 and 14 for the 2007/2008 Universal Waste Shipping Documentation). Located at the Monfort Building, I observed five closed cardboard containers of universal waste-lamps (spent 8ft. fluorescent lamps) and one yellow 55 gallon container of spent HID lamps labeled as "Waste Lamps" and "Used HID Bulbs" (see photos #14-#16). Additionally, I observed at least 37 universal waste-lamps (spent T8, 100 watt, and 8ft. fluorescent lamps) not labeled as "Universal Waste" and not stored in a closed container (see photos #10-#13). I asked Mr. Enyart if he was aware of the length of time the universal waste-lamps accumulated at the Monfort Building. Mr. Enyart stated that the universal waste-lamps located in the Monfort Building have been in storage since the last off-site shipment. At the time of the inspection, Mr. Enyart was not aware of the date of the last universal waste-lamps off-site shipment. I informed Mr. Enyart that the universal waste-lamps stored in the Monfort Building must be stored in a closed container (except for adding or removing universal waste), must be labeled with the words "Universal Waste-Lamps," "Waste Lamps," or "Used Lamps" and the earliest date of accumulation must be identified. Violations are noted in Section 5.0.

Universal Waste-Batteries - Triumph generates spent batteries (alkaline and nickel cadmium) from the battery replacement of various equipment on-site. Thus far in the 2009 calendar year, Triumph has generated 106 pounds of spent batteries (alkaline and nickel cadmium). Triumph's spent batteries are recycled by Veolia Technical Solutions, Port Washington, WI, as universal waste (see attachment 15 for the 2008-2009 Universal Waste-Batteries Shipping Documentation). Mr. Enyart stated that spent lead-acid batteries generated on-site from the service of various machinery (forklifts, shag trucks, etc.) are sent to one of three vendors for recycling (see attachment 16 for the Battery Vendor List). The quantity of spent lead-acid batteries generated per year was not determined at the time of the inspection. At the time of the inspection, I did not observe any spent lead-acid batteries in storage. Located at the PPE Room, I observed two ½ full red five gallon containers of spent alkaline batteries and spent nickel cadmium batteries labeled as "Used Batteries" (see photo #19). Located at the Parts Room, I observed one ½ full red five gallon container of spent alkaline batteries and spent nickel cadmium batteries not labeled as "Universal Waste-Batteries," "Waste Batteries," or "Used Batteries" (see photo #17). Mr. Enyart stated that the universal waste-batteries stored at the Parts and PPE Rooms have accumulated since January 2009. Triumph's latest off-site shipment of universal-waste batteries was on January 28, 2009 (see attachment 15 for the 2008-2009 Universal Waste-Batteries Shipping Documentation). I informed Mr. Enyart that the universal waste-batteries stored in the Parts Room must be labeled with the words "Universal Waste-Batteries," "Waste Batteries," or "Used Batteries." A violation is noted in Section 5.0.

Parts Cleaner - Triumph's Refrigeration Department uses Pro-Green brand cleaner to clean various equipment (mechanical seals and bearings) on-site. Mr. Enyart stated that no spent Pro-Green brand cleaner has been disposed of, as the original amount (5 gallons) put into the parts cleaner unit is still usable. From my review of the Pro-Green brand cleaner material safety data sheet (MSDS) copy, it appears that the spent cleaner would be non-hazardous (see attachment 17 for the Pro-Green Cleaner MSDS). I review Triumph's management of their Pro-Green brand cleaner and no apparent violations were noted.

Used Oil - Triumph generates an average of 1,500 gallons of used oil per year from the maintenance of their hydraulic compressor pumps. Triumph's used oil is recycled by Safety-Kleen, Kansas City, MO. Located at the East Rendering Bay and the Compressor Room, I observed one 500 gallon aboveground used oil tank and two ¾ full 55 gallon containers of used oil properly labeled with the words "Used Oil" (see photos #6 and #9). I reviewed Triumph's management of their used oil and no apparent violations were noted.

Scrap Metal - Triumph generates scrap metal from deconstruction activities conducted on-site. Mr. Enyart stated that Advantage Metal Recycling, Kansas City, MO and Midwest Scrap Management, Kansas City, MO, recycles Triumph's scrap metal. Mr. Enyart stated that Triumph recycled 79,960 pounds of scrap metal via Advantage Metal Recycling and 70,940 pounds via Midwest Scrap Management in the 2008 calendar year. I reviewed Triumph's management of their scrap metal and no apparent violations were noted.

General Trash - General trash includes empty housekeeping/cleaning containers, restroom wastes, and lunch wastes. Deffenbaugh Industries Inc., St. Joseph, MO, disposes of Triumph's general daily.

5.0 VIOLATIONS

5.0.1. Failure To Make A Hazardous Waste Determination (NOV #1)

According to 40 CFR 262.11, a hazardous waste determination must be made on all solid wastes. A hazardous waste determination had not been made on the following:

Administrative Building (Safety Office)

- One $\frac{3}{4}$ full five gallon container of formalin labeled with the words "Outdated Chemical" (see photo #1).

Mr. Enyart stated that the one $\frac{3}{4}$ full five gallon container of formalin (labeled with the words "Outdated Chemical") has been in storage at the Safety Office for at least two to three weeks. Mr. Enyart stated that the five gallon container of formalin (labeled with the words "Outdated Chemical") was determined to be unusable by the Microbiology Lab staff. I asked Mr. Enyart if the one $\frac{3}{4}$ full five gallon container of formalin (labeled with the words "Outdated Chemical") was RCRA hazardous. Mr. Enyart stated "I don't know." I asked Mr. Enyart if Triumph has made a hazardous waste determination on the one $\frac{3}{4}$ full five gallon container of formalin (labeled with the words "Outdated Chemical") in the Safety Office. Mr. Enyart stated "No."

5.0.2. Failure To Store Universal Waste-Lamps In A Closed Container (NOV #2)

According to 40 CFR 273.13(d)(1), universal waste-lamps must be stored in a closed container. The following universal waste-lamps were not stored in a closed container:

Monfort Building

- One open cardboard container storing at least 20 spent T8 fluorescent lamps (see photo #10).
- One open cardboard container storing ten spent 8 ft. spent fluorescent lamps (eight green tip lamps and two silver tip spent fluorescent lamps) (see photo #11).
- One open cardboard container storing three spent T8 fluorescent lamps (see photo #11).
- One open cardboard container storing six spent 100 watt fluorescent lamps (see photo #12).

5.0.3. Failure To Properly Label Universal Waste-Batteries And Universal Waste-Lamps (NOV #3)

According to 40 CFR 273.14, universal waste must be labeled or marked to identify the type of universal waste. Universal waste batteries must be labeled or marked as "Universal Waste-Batteries," "Waste Batteries," or "Used Batteries." Universal waste lamps must be labeled or marked as "Universal Waste-Lamps," "Waste Lamps," or "Used Lamps." The following types of universal waste (lamps and batteries) were not labeled or marked:

Parts Room

- One $\frac{1}{2}$ full five gallon red container of universal waste batteries (see photo #17).

**(CONTINUATION) 5.0.3. Failure To Properly Label Universal Waste—
Batteries And Universal Waste—Lamps (NOV #3)**

Monfort Building

- One open cardboard container storing at least 20 spent T8 fluorescent lamps (see photo #10). This container was inadvertently left on the *Notice of Violation* form. After further review of the photograph log, this open cardboard container was properly labeled as "Waste Lamps" (see photo #13). On June 15, 2009 (11:10 a.m. - phone conversation), I informed Mr. Enyart that Triumph will not need to respond to the violation on the *Notice of Violation* form.
- One open cardboard container storing ten spent 8 ft. spent fluorescent lamps (eight green tip lamps and two silver tip spent fluorescent lamps) (see photo #11).
- One open cardboard container storing three spent T8 fluorescent lamps (see photo #11).
- One open cardboard container storing six spent 100 watt fluorescent lamps (see photo #12).
- One yellow 55 gallon container of spent HID lamps (see photo #16). This container was inadvertently left on the *Notice of Violation* form. After further review of the photograph log, the yellow 55 gallon container of spent HID lamps was labeled as "Used HID Bulbs." On June 15, 2009 (11:10 a.m. - phone conversation), I informed Mr. Enyart that Triumph will not need to respond to the violation on the *Notice of Violation* form.

**5.0.4. Failure To Demonstrate The Length Of Universal Waste Accumulation
(NOV #4)**

According to 40 CFR 273.15(c), a small quantity handler of universal waste must be able to demonstrate the length of universal waste accumulation. Triumph could not demonstrate the length of accumulation for the following universal waste—lamps:

Monfort Building

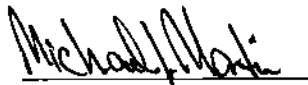
- One open cardboard storing containing at least 20 spent T8 fluorescent lamps (see photo #10).
- One open cardboard container storing ten spent 8 ft. spent fluorescent lamps (eight green tip lamps and two silver tip spent fluorescent lamps) (see photo #11).
- One open cardboard container storing three spent T8 fluorescent lamps (see photo #11).
- One open cardboard container storing six spent 100 watt fluorescent lamps (see photo #12).
- One 55 gallon container of spent HID lamps labeled with the words "Used HID Bulbs" (see photo #16).
- Five closed cardboard containers of universal waste—lamps (spent 8ft. fluorescent lamps) labeled as "Waste Bulbs" (see photos #14 and #15). This container was inadvertently left off the *Notice of Violation* form. On June 15, 2009 (11:10 a.m. - phone conversation), I informed Mr. Enyart that Triumph will need to respond to the violation on the *Notice of Violation* form.

(CONTINUATION) 5.0.4. Failure To Demonstrate The Length Of Universal Waste Accumulation (NOV #4)

I asked Mr. Enyart if he was aware of the length of time the universal waste-lamps accumulated at the Monfort Building. Mr. Enyart stated that the universal waste-lamps located in the Monfort Building have been in storage since the last off-site shipment. At the time of the inspection, Mr. Enyart was not aware of the date of the last universal waste-lamps off-site shipment date. On June 5, 2009, Mr. Enyart provided me with an electronic copy of Triumph's latest off-site universal waste-lamps shipment documentation for review (see attachment 14 for the 2008 Universal Waste Shipping Documentation). From my review of the universal waste-lamps shipment documentation, Triumph's last off-site shipment of waste-lamps was on November 6, 2008 by Safety-Kleen, Kansas City, MO.

6.0. SUMMARY

At the conclusion of the inspection, I provided Triumph with a request for information (see attachment 18 for the Request for Information Correspondence) for the following: (1) a copy of the .25 caliber rim fire cartridge analytical report and MSDS, (2) a copy of the wastewater sludge analytical report copy, (3) a copy of the Pro-Green cleaner MSDS, and (4) a copy of the Hotsy Brand soap detergent MSDS (detergent used to clean the inside of the trailers that transport live hogs) (see attachment 19 for the Hotsy Brand Soap Detergent MSDS). On May 27, 2009 and June 5, 2009, I received electronic copies of all the above requested information, except for the copy of the .25 caliber rim fire cartridge analytical report (Triumph does not have any analysis of their spent .25 caliber blank rim fire cartridges). On June 15, 2009, I spoke to Mr. Enyart (11:10 a.m. - phone conversation) and sent him an email regarding the generation rate and waste management of Triumph's spent rubber components. As of the date of this report, I have not received a response from Mr. Enyart. I reviewed all applicable Federal CESQG requirements and no other apparent violations were noted in Section 5.0.



Michael J. Martin
Life Scientist
Date: June 23, 2009

Attachments

- 1) *Region 7 Multi-Media Screening Checklist* (2 pages)
- 2) Facility Layout (1 page)
- 3) *Confidentiality Notice* (1 page)
- 4) *Receipt of Document and Samples* (1 page)
- 5) *Notice of Violation* (2 pages)
- 6) EPA RCRA Handler Report (1 page)
- 7) 2005-2008 Hazardous Waste Summary Reports (8 pages)
- 8) 2006-2009 Uniform Hazardous Waste Manifests (14 pages)
- 9) Wastewater Contribution Permit (15 pages)
- 10) Wastewater Sludge Analytical Report (8 pages)
- 11) Missouri Fertilizer Permit (1 page)
- 12) .25 Caliber Blank Rim Fire Cartridge MSDS (5 pages)
- 13) 2007 Universal Waste Shipping Documentation (2 pages)
- 14) 2008 Universal Waste Shipping Documentation (1 page)
- 15) 2008-2009 Universal Waste-Batteries Shipping Documentation (5 pages)
- 16) Battery Vendor List (1 page)
- 17) Pro-Green Cleaner MSDS (3 pages)
- 18) Request for Information Correspondence (1 page)
- 19) Hotsy Brand Soap Detergent MSDS (2 pages)

Photograph Log (3 pages)

Photographs (11 pages/19 photos)

REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Name: Triumph Foods Inspector: Michael S. Martin
Facility Ownership: Triumph Foods Primary Media: KLA
Street: 5302 Stockyards Expressway Inspector Phone Ext.: 7119
City: St. Joseph State: MO Zip: 64501 Date: 5/26/2009
Phone: (816) 346-2825 Facility Contact: Steven Enyart SIC/NAICS Code: 311611
Number of Employees: 2,700 Work Hours/Shifts: 24 hrs per day Facility Subject to OSHA regulations Yes ☒ No ☐
Main facility activity, major process chemical(s) & description: Animal slaughtering (Hogs)

(Check all that apply): painting/coating (water-based ☒, solvent-based ☐) printing ☐ reacting ☐ formulating ☐ distilling ☐
water treatment ☐ refrigeration ☒ manufacturing ☐ parts washers/degreasing (water-based ☐, halogenated-based ☐,
non-halogenated-based ☐) combustion (boiler, furnaces, oxidizers) ☐ plating (chrome ☐, other _____).

ENVIRONMENTAL JUSTICE (Note: Forward to EJ if a concern is identified during your inspection)

1. Is the facility located in an apparent low income area (e.g., with many abandoned and dilapidated properties)? No ☒ (stop) Yes ☐
If yes, is facility less than 1000 feet from nearest routinely occupied property (house, school, etc.)? No ☐ (stop) Yes ☐ **Forward to EJ**

EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA) & TOXIC SUBSTANCE CONTROL ACT (TSCA)

1. Did facility file a Tier II report with fire department, Local & State Emergency Planning Committee? Yes ☒ No ☐ **Forward to EPCRA**
2. Did facility manufacture, import, or process (formulate, blend, package) >25,000 lbs of a chemical or >100 lbs of a Persistent Bioaccumulative Toxin (lead, mercury, or polycyclic aromatic compounds) at any time over the last 5 years? No ☒ (stop) Yes ☐ **Forward to EPCRA**
3. Has the facility: **If any box in question 3 is marked - Forward to EPCRA**
a. Stored ≥500 lbs of ammonia ☒, ≥100 lbs of chlorine ☐, or ≥10,000 lbs of an industrial chemical ☒, at any time over the last 2 years? ☒
b. Stored ≥10,000 lbs of pressurized flammable material (propane, methane, butane, pentane, etc.) at any time over the last 2 years? ☐
c. Used ≥10,000 lbs of ammonia ☒, chlorine ☐, halogenated solvents ☐, solvent-based paints ☐, or solvents ☐, or nitrated compound, over the last calendar year? ☐
d. Generated ≥ one half pound of metal dusts, fumes, or metal turnings, over the last calendar year? ☒
4. Does the facility have any oil filled electrical equipment? No ☒ (stop) Yes ☐ **Forward to TSCA and ask** Has facility tested oil filled equipment to determine PCB content? No ☐ Yes ☐ number containing PCBs greater than 50 ppm _____ and percent of all equipment tested _____. Is equipment leaking (including wet or weeping equipment)? No ☐ Yes ☐ - **Get Photo**

CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment, Storm Water, & Wetlands

1. Does the facility discharge any wastewater to storm sewers, surface water, or the land? No ☒ (stop) Yes ☐
If yes, are all wastewater discharges permitted? Yes ☐ No ☐ **Forward to CWA**
2. Does the facility have process wastewaters that are discharged to a city POTW (Publicly Owned Treatment Works)? No ☐ (stop) Yes ☒
If yes, are the discharges permitted by: State? ☐, City? ☒ - If yes, Stop here. No ☐ **Forward to CWA**
If yes, does the city have a state or EPA approved pretreatment program? Yes ☒ No or Don't Know ☐ **Forward to CWA**
3. During rainfall events, can storm water carry pollutants from manufacturing, processing, storage, disposal, shipping and receiving areas, or from construction sites >1 acre, to storm sewers or surface water? No ☒ (stop) Yes ☐
If yes, does the facility have an NPDES permit for these storm water discharges? Yes ☐ No ☐ **Forward to CWA**
4. Did you see any wastewater discharges not identified by the facility? No ☒ (stop) Yes ☐ - Identify location, time, appearance of discharge: _____
(Get Photo) **Forward to CWA**
5. Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)? No ☐ (stop) Yes ☒ **Detention Area**
If yes, have any wetland areas been dredged, filled, channelized, dammed, or had gravel removed from them within the last 5 years? No ☒ (stop) Yes ☐ - Identify location and timeframe _____ (Get Photo) **FWD to Wetlands**

SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)

1. Does facility discharge any liquids to the subsurface (septic systems, disposal wells, cesspools, etc.)? No ☒ (stop) Yes ☐ Forward to UIC
If yes, do these liquid wastes consist of sanitary wastewater only? Yes ☐ No ☐
2. Does facility provide drinking water to 25 people or more from its own source (private well, pond, etc.)? No ☒ (stop) Yes ☐ Forward to PWS
If yes, does the facility test or monitor its drinking water in order to comply with state regulations? Yes ☐ No ☐

CLEAN AIR ACT (CAA) and CFCs

1. Do you see any dense, non-steam, smoke or dust emissions leaving the facility property? No ☒ Yes ☐ Forward to CAA
Source _____ (Get Photo)
2. Does the facility have any new air pollution emitting equipment that was constructed or installed in the past 5 years? No ☒ (stop) Yes ☐
If yes, is equipment permitted? Yes ☐ No ☐ Forward to CAA Describe: _____
3. Does the facility have any cooling units that contain >50 lbs of refrigerant? No ☐ (stop) Yes ☒ Forward to CFC
If yes, are these units: Self-serviced? ☒ Contract Serviced? ☒ - Service Company: Preston Tran
4. Does the facility have a refrigeration process that contains more than 10,000 lbs of ammonia? No ☐ (stop) Yes ☒ Forward to EPCRA/RMP
5. Does the facility service motor vehicle air conditioning systems? No ☒ (stop) Yes ☐ Forward to CFC

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) and UNDERGROUND STORAGE TANKS (UST)

1. Does the facility generate more than 30-gallons (220 lbs./100kg) of hazardous waste per month or at any one time? No ☒ (stop) Yes ☐
If yes, does facility have an EPA Hazardous Waste Identification Number? Yes ☐ (stop) No ☐ Forward to RCRA
2. Is hazardous waste treated ☐, stored >90-days ☐, burned ☐, land filled ☐, put in surface impoundments ☐ or waste piles ☐?
No ☒ (stop) Yes ☐ If yes, is the facility permitted for above described activity? Yes ☐ No ☐ Forward to RCRA
3. Did you see or does the facility have any large quantities of materials that the facility claims to be non-hazardous waste material (>10 drums, roll-offs, waste piles, etc. - exclude clean office trash, cardboard, & packaging type wastes)? No ☒ (stop) Yes ☐

Material Claimed To Be Non-Hazardous**How does the facility know these wastes are non-hazardous?**

- _____ Testing, industry or manuf. info., MSDS, etc. ☐; None available ☐ Forward to RCRA
- _____ Testing, industry or manuf. info., MSDS, etc. ☐; None available ☐ Forward to RCRA
- _____ Testing, industry or manuf. info., MSDS, etc. ☐; None available ☐ Forward to RCRA
- _____ Testing, industry or manuf. info., MSDS, etc. ☐; None available ☐ Forward to RCRA
- _____ Testing, industry or manuf. info., MSDS, etc. ☐; None available ☐ Forward to RCRA

4. Did you see any leaking hazardous waste containers, drums, or tanks? No ☒ Yes ☐ Forward to RCRA
Describe: _____ (Get Photo)
5. Did you see any signs of spills or releases (e.g., dead or stressed vegetation, stains, discoloration)? No ☒ Yes ☐ Forward to RCRA
Describe: _____ (Get Photo)
6. Did you see any chemical or waste handling practices that concern you (access to children/public)? No ☒ Yes ☐ Forward to RCRA & EPCRA Describe: _____ (Get Photo)
7. Does the facility have any past or present underground petroleum product or hazardous material tanks? No ☒ Yes ☐ Forward to UST
8. Does the facility have any underground fuel tanks for emergency generators? No ☒ Yes ☐ Forward to UST

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

1. Does the facility have any aboveground oil tanks (petroleum, synthetic, animal, fish, vegetable), with an aggregate volume >1,320 gallons?
No ☒ (stop) Yes ☐ - Does the facility have a certified SPCC Plan? Yes ☐ No ☐ Forward to SPCC
If yes, are there secondary containment systems for the tanks? Yes ☐ No ☐ Forward to SPCC
If yes, are any tanks leaking where oil could reach waters of the State or U.S.? No ☐ Yes ☐ (Get Photo) Forward to SPCC

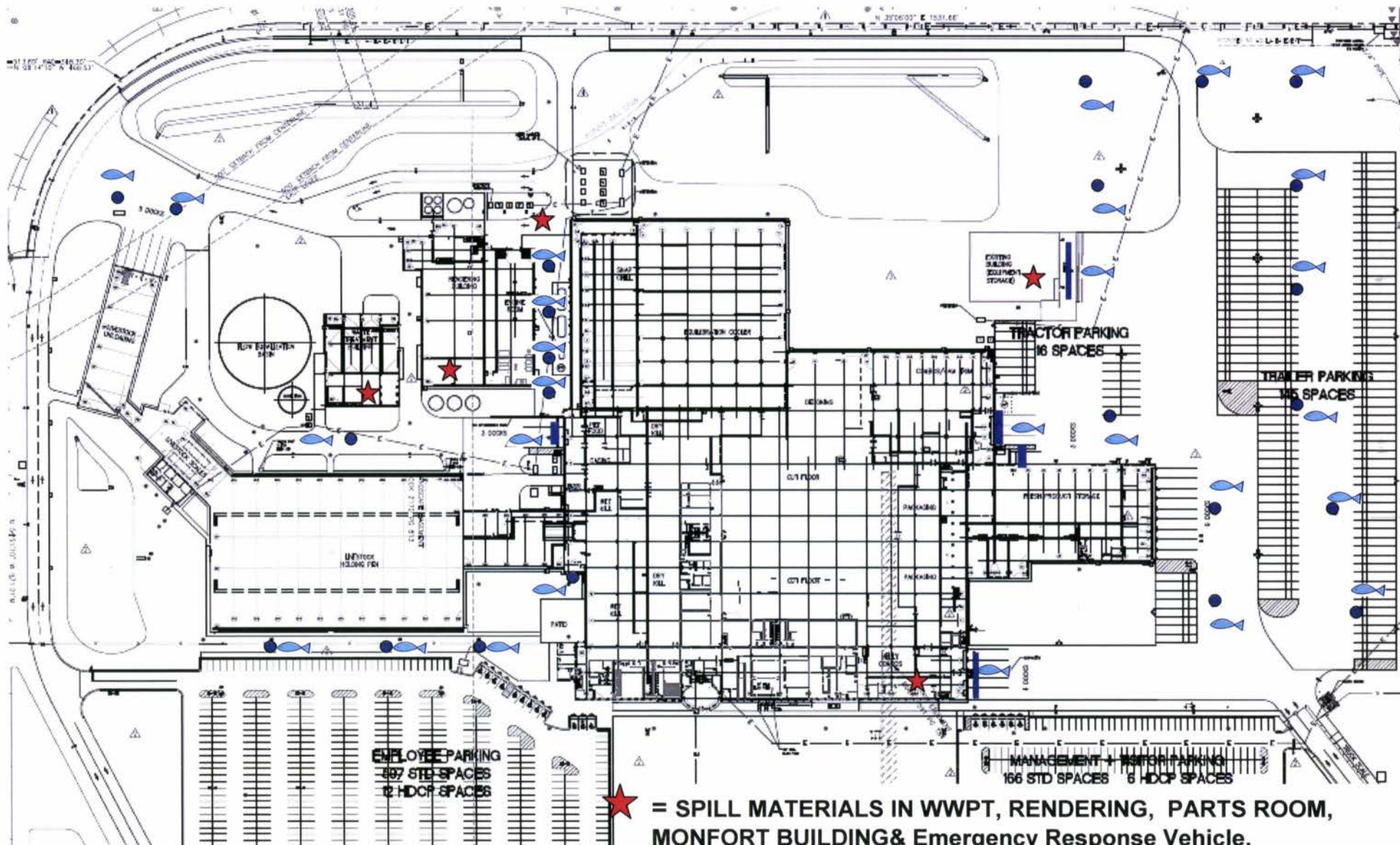
ENVIRONMENTAL MANAGEMENT SYSTEMS (EMS)

1. Does your facility have an EMS? No ☐ Yes ☒
2. Is the facility's EMS ISO 14001 certified? No ☒ Yes ☐

* PLEASE TAKE PHOTOS TO DOCUMENT POTENTIAL PROBLEMS



= OPEN STORM WATER DRAINS: NO OIL, CHEMICALS, FOOD PRODUCTS OR UNTREATED WASTE WATER ALLOWED!



REPORT ALL SPILLS TO SUPERVISION IMMEDIATELY. COVER OR PLUG STORM DRAINS TO PREVENT RUN OFF INTO THEM

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name <u>Triumph Foods</u>	
Facility Address <u>5302 Stockyards Expy. St. Joseph, MO 64504</u>	
Inspector (print) <u>Michael J. Martin</u>	
U.S. EPA, Region VII, 901 N. 5th St., Kansas City, KS 66101	Date <u>5/26/2009</u>

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print) <u>R. PATT LILLY</u>	Signature/Date <u>R. Patt Lilly 5/26/09</u>

I have received this Notice and <u>DO</u> want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested;

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name <u>Triumph Foods</u>
Facility Address <u>5302 Stockyards Expy. St. Joseph, MO 64504</u>

Documents Collected? YES ☒ (list below) NO ☐

Samples Collected? YES ☐ (list below) NO ☒ Split Samples: YES ☐ NO ☐

Documents/Samples were: 1) Received no charge ☒ 2) Borrowed ☐ 3) Purchased ☐

Amount Paid: \$ Method: Cash ☐ Voucher ☐ To Be Billed ☐

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

- 1) Facility layout (1 page)
- 2) 7/1/2005 - 6/30/2008 Hazardous Waste Summary Reports (8 pages)
- 3) Wastewater Permit (15 pages)
- 4) 6/6/2006 - 3/4/2009 Uniform Hazardous Waste Manifests (14 pages)
- 5) Waste Batteries Recycling Certificates 2/2/2007 - 1/28/2009 (5 pages)
- 6) Lead Acid Battery Recycler Form (1 page)
- 7) 6/15/2007 + 10/10/2007 Universal Waste hump Bill of Lading (2 pages)

Facility Representative (print) <u>R. PATT LILLY</u>	Signature/Date <u>[Signature] 5/26/09</u>
Inspector (print) <u>Michael J. Martin</u>	Signature/Date <u>[Signature] 5/26/2009</u>
U.S. EPA, Region VII, 901 N. 5th Street, Kansas City, KS 66101	

(rev:1/20/93)

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: Triumph Foods
Address: 532 Stockyards Expy.
St. Joseph, Mo 64504
EPA ID Number: MOR000522748 Date: 5/26/2009

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the inspection.

Citation	Description of Violation
1) <u>10658 25-S.262(1) incorporating</u> <u>40 CFR 262.11</u>	<u>Failure to make a hazardous waste determination:</u> <u>(A) Steve Export's Office</u> <u>- One 24 Full 1 gallon container of CB Formalin</u>
2) <u>40 CFR 273.13(d)(1)</u>	<u>Failure to keep 4 boxes of spent fluorescent lamps</u> <u>(Universal Waste) closed in the Monfort building.</u>
3) <u>40 CFR 273.14</u>	<u>Failure to properly label one 1/2 Full 5 gallon red</u> <u>Container of Waste batteries (Parts Room) and</u> <u>4 Containers of spent lamps (3 boxes of spent fluorescent</u> <u>lamps and one 55 gallon container of spent HID lamps)</u> <u>(Monfort Building)</u>

You are requested to submit a written response within **14 calendar days** of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII
Environmental Services
901 North 3rd Street
Kansas City, KS 66101
ATTN: Michael J. Martin

If you have any questions about this Notice or wish to discuss your response, you may call me at
(913) 551-7149, or Kevin Snowden (Compliance Officer) at
(913) 551-7622.

This Notice prepared by Michael J. Martin Date: 5/26/2009

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: R. PATT LILLY Date: 5/26/09
Signature: [Signature]
Title: CAO

TO: Facility Name: _____
Address: _____
EPA ID Number: _____ Date: _____

[illegible]

ATTN.

If you have any questions about this Notice or wish to discuss your response, you may call me at _____, or _____ (Compliance Officer) at _____.

This Notice prepared by Michael S. Martin Date: 5/26/2009

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

R. PATT LILLY Date: 5/26/09
 J. M. Riley
 CAO

HANDLER INFORMATION REPORT

March 16, 2009

Procedures for Inspectors performing Site Visits

If the facility wants to make a change, they must complete a Notification of Regulated Waste Activity form # MO780-1164, and send it to the Department of Natural Resources, Waste Management Program, PO Box 176, Jefferson City, MO 65102. The form can be found at <http://www.dnr.mo.gov/forms/780-1164.pdf>

If during the course of the site visit, the inspector/investigator becomes aware of any changes which should be made to the information printed on this form, please make the corrections and return the form to: Beth Koesterer, AWMD/RESP.

EPA RCRA ID Number: MOR000522748

Name of Company/Site: TRIUMPH FOODS
Location of Site: 5302 STOCKYARDS EXPWY
ST JOSEPH, MO 64504
BUCHANAN County

Land Type: Private

NAICS: 311611 - Animal (except Poultry) Slaughtering

Mailing Address: 5302 STOCKYARDS EXPWY
ST JOSEPH, MO 64504

Site Contact: STEVEN ENYART
Phone Number: (816)396-2825
Address: 5302 STOCKYARDS EXPWY
ST JOSEPH, MO 64504

Current Owner of Site: TRIUMPH FOODS
Phone Number: (816)396-2700
Owner Type: Private

Current Operator of Site: TRIUMPH FOODS
Phone Number: (816)396-2700
Operator Type: Private

TYPE(S) OF REGULATED ACTIVITY: Federal Small Quantity Generator

Hazardous Wastes Handled: D002 D001

N 06/05/06 2

Certified by Notification on 06/05/06 by
STEVEN W ENYART 05/31/06
SAFETY MGR

Date of Site Visit: May 26, 2009

Name of Inspector (Please print): Michael S. Martin

(Check one): ☒ EPA R7 ENSV ☐ EPA R7 Contractor ☐ NOWCC/SEE Investigator

Signature of Inspector: Michael S. Martin



Triumph Foods



COPY

5/26/09 82

(816) 396-2700

Fax: (816) 396-2807

www.triumphfoods.com

Steve Enyart
Safety Manager
senyart@triumphfoods.com
816-396-2825
816-396-2767 FAX

MO ID# 041241

February 15, 2007

RE: Reply to NOV of "Generator's Hazardous Waste Summary Report"

Andrea Kliethermes
Missouri Department of Natural Resources
Hazardous Waste Program
PO Box 176
Jefferson City, MO 65102-0176

Ms Kliethermes:

Enclosed you will find our "Generator's Hazardous Waste Summary Report" for fiscal year 2006. I apologize that we are late in submitting this document.

I would also like to add that we are no longer doing the fat analysis testing on our site which required the use of Cyclohexane, which is now being done by a contracted off site laboratory.

We will have one smaller disposal of this chemical for FY 2007, but do not anticipate creating any further waste streams.

I have, however, been advised by Safety Kleen that it may be wise for us to maintain our small quantity generator status in the event future process additions or spill events occur and we find our selves in need of disposal.

Please let me know what fees are due for our error. Thank you.

Respectfully,

Steve Enyart
Safety Manager
Triumph Foods



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
P.O. BOX 176
JEFFERSON CITY, MISSOURI 65102
(573) 751-3176

GENERATOR'S HAZARDOUS WASTE
SUMMARY REPORT - PART I

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

GENERATOR'S NAME

TRIUMPH FOODS

CONTACT PERSON (NAME)

STEVE ENYART

SITE STREET ADDRESS (DO NOT ENTER P.O. BOX)

5302 STOCKYARDS EXPRESSWAY

CITY

STATE

ZIP CODE

ST. JOSEPH

MO

64504

GENERATOR'S EPA I.D. NUMBER

MO R009522748

GENERATOR'S MISSOURI I.D. NUMBER

041241

NOTE: THE FEDERAL EPA AND MISSOURI GENERATOR I.D. NUMBERS ARE ASSIGNED EXCLUSIVELY TO THE SITE WHERE WASTE IS PRODUCED. YOU MUST NOTIFY THE DEPARTMENT IF THE ADDRESS FOR THE SITE OF GENERATION CHANGES.

NOTE PLEASE READ INSTRUCTIONS AND EITHER PRINT OR TYPE

SECTION A - REPORT IDENTIFICATION (Complete Item 1 or Item 2, NOT BOTH)

1. ANNUAL

7/1 2005 (YEAR) to 6/30 2006 (YEAR)

2. QUARTERLY

FOR THE PERIOD ENDING

☐ 9/30 (YEAR) ☐ 12/31 (YEAR)

☐ 3/31 (YEAR) ☐ 6/30 (YEAR)

3. PAGE

1 OF

SECTION B - GENERATOR IDENTIFICATION

NOTE: Complete only those items where the information has changed.

4. GENERATOR'S NAME ☐ HAS CHANGED

5. GENERATOR CONTACT PERSON (NAME) ☐ HAS CHANGED

TELEPHONE NUMBER ☐ HAS CHANGED

6. MAILING ADDRESS ☐ HAS CHANGED

CITY

STATE

ZIP CODE

7. PLANT SITE ADDRESS

CITY

STATE

ZIP CODE

8. NAME OF PARENT FIRM ☐ HAS CHANGED

SECTION C - STATUS OF WASTE GENERATED

9.

NUMBER OF SHIPMENTS MADE. Enter the number of shipments made this reporting period. If greater than zero, complete Part 2, sign certification and transmit to the department. If zero, check item 10 or item 11, whichever is appropriate.

10.



REPORTABLE QUANTITY NOT GENERATED. Sign certification and transmit to the department. (Do not complete Part 2)

11.

REPORTABLE QUANTITY GENERATED BUT NOT SHIPPED OFF-SITE THIS QUARTER. Sign certification and transmit to the department. (Do not complete Part 2)

SECTION D - COMMENTS

12.

WE HAD ONLY ONE SHIPMENT OF CYCLOHEXANE, 20 GAL @ 134 LBS, JUNE 6, 2006. MANIFEST DOCUMENT NO. 71208

SECTION E - CERTIFICATION STATEMENT

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

PRINT NAME

STEVEN W. ENYART

SIGNATURE

DATE

2/13/2007



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
PO BOX 176
JEFFERSON CITY, MISSOURI 65102
(573) 751-3176

GENERATOR'S HAZARDOUS WASTE SUMMARY REPORT - PART I



5/26/07 88
COPY

GENERATOR NAME

Triumph Foods

CONTACT PERSON NAME

Steve Enyart

SITE STREET ADDRESS (DO NOT ENTER PO BOX NUMBER)

5302 Stockyards Expressway

CITY

St. Joseph

STATE

MO

ZIP

64504

GENERATOR EPA ID NUMBER

MOR 000522748

MISSOURI ID NUMBER

041241

NOTE: THE FEDERAL EPA ID AND MISSOURI GENERATOR ID NUMBERS ARE ASSIGNED EXCLUSIVELY TO THE SITE WHERE WASTE IS PRODUCED. YOU MUST NOTIFY THE DEPARTMENT IF THE ADDRESS FOR THE SITE OF GENERATION CHANGES.

NOTE: PLEASE READ INSTRUCTIONS AND EITHER PRINT OR TYPE

SECTION A - REPORT IDENTIFICATION (Complete Item 1 or Item 2, NOT BOTH)

1. ANNUAL

From 7/1 2006

(YYY)

To 6/30 2007

(YYY)

2. QUARTERLY FOR THE PERIOD ENDING

☐ 9-30 - YYYY

☐ 3-31 - YYYY

☐ 12-31-YYYY

☐ 6-30 -YYYY

3

PAGE 1 of

SECTION B - GENERATOR IDENTIFICATION CHANGES

4. GENERATOR NAME

☐ CHANGED

5. CONTACT PERSON

☐ CHANGED

TELEPHONE NUMBER

☐ CHANGED

6. MAILING ADDRESS

☐ CHANGED

CITY

STATE

ZIP

7. PLANT SITE ADDRESS

CITY

STATE

ZIP

8. NAME OF PARENT FIRM

☐ CHANGED

SECTION C - STATUS OF WASTE GENERATED

9

NUMBER OF SHIPMENTS MADE. Enter the number of shipments made this reporting period. If greater than 0, complete Part II, sign certification, and transmit to the Department. If zero, check Item 10 or Item 11, whichever is appropriate.

1

10

REPORTABLE QUANTITY NOT GENERATED. Sign certification and transmit to the Department. (Do not complete Part II)

11

REPORTABLE QUANTITY GENERATED BUT NOT SHIPPED OFF-SITE THIS QUARTER. Sign certification and transmit to the Department. (Do not complete Part II)

SECTION D - COMMENTS

10.

We had only one shipment of cyclohexane, June 15, 2007. Manifest document # 000219325. We do not anticipate generating this waste in the future, but will maintain our MO and EPA ID numbers as active.

SECTION E - CERTIFICATION STATEMENT

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

PRINT NAME

Steven W. Enyart

SIGNATURE or AUTHORIZED PIN

6056

DATE

July 20, 2007



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
PO BOX 176
JEFFERSON CITY, MISSOURI 65102
(573) 751-3176

**GENERATOR'S HAZARDOUS WASTE
SUMMARY REPORT - PART II**

BEFORE COPYING FORM, ENTER THE GENERATOR NAME
AND ID NUMBER AS SHOWN ON PART I

GENERATOR NAME Triumph Foods	
GENERATOR EPA ID NUMBER	MOR000522748
GENERATOR MISSOURI ID NUMBER	041241

NOTE: PLEASE READ INSTRUCTION AND EITHER TYPE OR PRINT

ATTENTION: Summarize all shipments made to the Hazardous Waste Management Facility you have identified in Section G below. Additional pages are required for each off-site management facility listed.

SECTION F - REPORT IDENTIFICATION (AS SHOWN ON PART I)

1. FOR THE PERIOD ENDING (CHECK ONE AND FILL IN YEAR - (YYYY))

☐ 9-30 - YYYY

☐ 12-31 - YYYY

2. PAGE

2

☐ 3-31 - YYYY

☒ 6-30 - YYYY 2007

OF

2

SECTION G - FACILITY IDENTIFICATION

3. FACILITY NAME (NAME OF OFF-SITE LOCATION WHERE WASTE WAS DELIVERED)

Safety-Kleen Systems, INC.

4. FACILITY EPA ID

MOD980973564

5. FACILITY SITE ADDRESS

3700 Lagrange Road

CITY

Smithfield

STATE

KY

ZIP

40068

SECTION H - WASTE IDENTIFICATION

6. DESCRIPTION OF WASTE SHIPPED TO THE FACILITY LISTED ABOVE	7. EPA HAZARDOUS WASTE NUMBER	8. TAX CODE (SEE INST)	9. TOTAL AMOUNT OF WASTE	10. UNIT OF MEAS'	11. If Unit of Meas' G.L. or Y Enter SPECIFIC GRAVITY	12. MANAGE- MENT METHOD CODE
RQ waste flammable liquids, corrosive, N.O.S. (cyclohexane, acetic acid) 3(8) UN2924 PG II	D001 D002	▼	12 Gal.	▼	0.8	H ▼
	▼	▼		▼		▼
	▼	▼		▼		▼
	▼	▼		▼		▼
	▼	▼		▼		▼
	▼	▼		▼		▼
	▼	▼		▼		▼

SECTION I - TRANSPORTATION SERVICES UTILIZED

13. COMPANY NAME	14. MISSOURI ID NO.	15. US EPA ID NO.
a Safety-Kleen Systems, INC. 3700 Lagrange Road, Smithfield KY 40068	H- H1273	MOD980973564
b	H-	
c	H-	

SECTION J - COMMENTS

16

RESPONSE FORM

041241 MOR000522748 6056
TRIUMPH FOODS
5302 STOCKYARD EXPY
ST JOSEPH, MO 64504

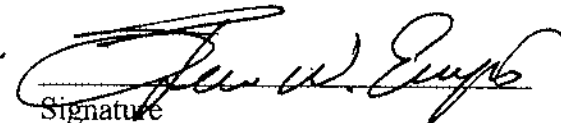
☒ Yes, we will report electronically and use the PIN listed above

☐ Yes, we will report electronically, but wish to use the following PIN. ☐ ☐ ☐ ☐

Note that your PIN must be four numbers (letters are not acceptable).

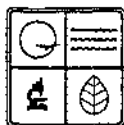
Please note this change on the portion of the letter you are keeping for your records.

STEVEN W ENYART
Print Name


Signature

7/20/07
Date

ORIGINAL



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
P.O. BOX 176
JEFFERSON CITY, MISSOURI 65102
(573) 751-3176
**GENERATOR'S HAZARDOUS WASTE
SUMMARY REPORT - PART II**

**BEFORE COPYING FORM, ENTER THE GENERATOR'S NAME AND
IDENTIFICATION NUMBERS AS SHOWN ON PART I.**

GENERATOR NAME

TRIUMPH FOODS

EPA ID NUMBER

MO2000522748

MISSOURI I.D. NUMBER

041241

NOTE ▶ PLEASE READ INSTRUCTIONS AND EITHER PRINT OR TYPE

ATTENTION: Summarize all shipments made to the Hazardous Waste Management Facility you have identified in Section G below. Additional pages are required for each off-site management facility listed.

SECTION F - REPORT IDENTIFICATION (AS SHOWN ON PART I)

1. FOR THE PERIOD ENDING (CHECK ONE & FILL IN YEAR)

☐ 9/30 (YEAR) ☐ 12/31 (YEAR)
☐ 3/31 (YEAR) ☒ 6/30 **2008** (YEAR)

2. PAGE

2 OF **2**

SECTION G - FACILITY IDENTIFICATION

3. FACILITY NAME (NAME OF OFF-SITE LOCATION WHERE WASTE WAS DELIVERED)

HERITAGE ENVIRONMENTAL SERVICES LLC

5. FACILITY SITE ADDRESS

7901 WEST MORRIS STREET

CITY
INDIANAPOLIS

STATE

IN

ZIP CODE

46231

4. FACILITY'S EPA I.D. NUMBER

IND093219012

SECTION H - WASTE IDENTIFICATION

L I N E	6. DESCRIPTION OF WASTE SHIPPED TO THE FACILITY LISTED ABOVE	7. EPA HAZARDOUS WASTE NUMBER	8. TAX CODE (SEE INST.)	9. TOTAL AMOUNT OF WASTE	10. UNIT OF MEAS	11. SPECIFIC GRAVITY	12. MANAGEMENT METHOD CODE
1	SPENT COPPER TEST SOLUTION, UN3264, CORROSIVE LIQUID, ACIDIC, INORGANIC, H.O.S.	D002D007 D009D011		28	P	.	H010
2						.	H
3						.	H
4						.	H
5						.	H
6						.	H

SECTION I - TRANSPORTATION SERVICES UTILIZED

13. COMPANY NAME

a **HERITAGE TRANSPORT LLC**

14. US EPA ID NUMBER

IND058484114

b

c

SECTION J - COMMENTS

15.

See W-9s
1/9/2009
6056

Steve Enyart

From: Steve Enyart [senyart@triumphfoods.com]
Sent: Monday, January 12, 2009 10:22 AM
To: 'hazwastereport@dnr.mo.gov'
Cc: 'coyler@triumphfoods.com'
Subject: Triumph Foods Corrected MO 780-1097
Attachments: GEN HZ WST SMRY RPT SUBMIT 2008.pdf

Per my email sent on Friday, 1/09/09; attached is our "Generator's Hazardous Waste Summary Report" showing the proper name and EPA ID for the transporter of our one shipment of Hazardous Waste for RY 2007 – 2008.

Please let me know that you have received this email and if it is sufficient to satisfy our reporting requirements. I will call if I do not get a reply today. Thanks.

Steve Enyart
Safety Manager
senyart@triumphfoods.com
5302 Stockyards Expressway
St. Joseph, MO 64504
816-396-2825

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY
Hazardous Waste Program

P.O. Box 176 Jefferson City, Missouri 65102
573-751-3176

5-085-02

HAZARDOUS WASTE MANIFEST

RECEIVED

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.
INSTRUCTIONS FOR THE COMPLETION OF THIS FORM ARE ON A SEPARATE SHEET.

JUN 14 2006

AGENCY
RESPONSE

U.S. COAST GUARD
1-800-424-8302

CHIEF OF POLICE
1-800-424-8300

DEPT. OF NATURAL
RESOURCES
573-634-2436

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. CESQG		2. Page 1 of 1		Information in the shaded areas is required by State Law.	
3. Generator's Name and Mailing Address TRIUMPH FOODS 5302 STOCKYARDS EXPRESSWAY SAINT JOSEPH MO 64504				A. Missouri Manifest Document Number 1208			
4. Generator's Phone 816 396-2825				B. G.S.I. (Gen. Site Address)			
5. Transporter 1 Company Name SAFETY-KLEEN SYSTEMS, INC.				C. MO. Trans. ID H-1273 M0694-499			
6. US EPA ID Number M00080973564				D. Transporter's Phone 816 796 9660			
7. Transporter 2 Company Name BedRock Inc DBA TSMT				E. MO. Trans. ID H-2376			
8. US EPA ID Number M0009715038998				F. Transporter's Phone 800-234-8768			
9. Designated Facility Name and Site Address SAFETY-KLEEN SYSTEMS, INC. 3700 LAGRANGE ROAD SMITHFIELD KY 40068				G. State Facility's ID RR-KY02			
10. US EPA ID Number 00065810				H. Facility's Phone 502 845-2453			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group (if any))				12. Containers		13. Total Quantity	14. Unit Wt/Vol.
a. RO WASTE FLAMMABLE LIQUIDS, CORROSIVE, N.O.S. (CYCLOHEXANE, ACETIC ACID) 3(8) UN2924 PG II (D001, D002) (ERG#132)				Number 091 Type DF		00030	G
b.							
c.							
d.							
J. Additional Descriptions for Materials Listed Above				K. HANDLING CODE (FACILITY USE ONLY)			
a. D001 D002 SG=1				a. INTERIM FINAL COMMENTS			
b.				b. 1 S01			
c.				c.			
d.				d.			
15. Special Handling Instructions and Additional Information 71208 MFST R/T#107079150 0003-0352-40 EMERGENCY RESP 800-468-1760(24 HR). IF UNDELIVERABLE RETURN TO GENERATOR. SK CORP AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY. MO ID CESQG M069449H-1273 SKDOT# A: 185166 B: C: D:							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.							
Printed/Typed Name David Donovan				Signature David Donovan		Month 06 Day 14 Year 2006	
17. Transporter 1 Acknowledgement of Receipt of Materials				Printed/Typed Name Scott Caution		Signature Scott Caution	
						Month 06 Day 14 Year 2006	
18. Transporter 2 Acknowledgement of Receipt of Materials				Printed/Typed Name David Davisan		Signature David Davisan	
						Month 06 Day 14 Year 2006	
19. Discrepancy Indication Space Lic # 99832 MO							
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name M. Andrew				Signature M. Andrew		Month 06 Day 14 Year 2006	

HAZARDOUS WASTE MANIFEST

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.
INSTRUCTIONS FOR THE COMPLETION OF THIS FORM ARE ON A SEPARATE SHEET.

EMERGENCY RESPONSE	U.S. COAST GUARD 1-800-424-8802	CHEMTREC 1-800-424-9300	DEPT. OF NATURAL RESOURCES 573-634-2436
-----------------------	------------------------------------	----------------------------	---

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. CIS16		MANIFEST DOCUMENT NO. 7/298		2. Page of 1		Information in the shaded areas is required by State Law.			
3. Generator's Name and Mailing Address TRIUMPH FOODS 5302 STOCKYARDS EXPRESSWAY SAINT JOSEPH MO 64504						A. Missouri Manifest Document Number 1-208					
4. Generator's Phone (314) 266-2025						B. G.S.I. (Gen. Site Address)					
5. Transporter 1 Company Name SAFETY-KLEEN SYSTEMS, INC.						C. MO. Trans. ID 11273 AKC674					
6. US EPA ID Number MOD8893161						D. Transporter's Phone 816-376-1234					
7. Transporter 2 Company Name Rockwell International						E. MO. Trans. ID 11273 AKC674					
8. US EPA ID Number 000553						F. Transporter's Phone 800-234-8765					
9. Designated Facility Name and Site Address SAFETY-KLEEN SYSTEMS, INC. 3700 LAGRANGE ROAD SMITHFIELD KY 40068						G. State Facility's ID RR-KY02					
10. US EPA ID Number KID0513801						H. Facility's Phone 502-845-2453					
11. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group (if any))						12. Containers		13. Total Quantity		14. Unit Wt/Vol.	
a. NO WASTE FLAMMABLE LIQUIDS, CORROSIVE, N.O.S. (CYCLOHEXANE, ACETIC ACID) 3(8)						Number Type		20930		G	
b.										EPA WASTE CODE	
c.										STATE	
d.										EPA WASTE CODE	
e.										STATE	
f.										EPA WASTE CODE	
g.										STATE	
h.										EPA WASTE CODE	
i.										STATE	
J. Additional Descriptions for Materials Listed Above						K. HANDLING CODE (FACILITY USE ONLY)					
a. 100% 0002 0001						a. INTERIM					
b.						b. FINAL					
c.						c. COMMENTS					
d.											
15. Special Handling Instructions and Additional Information EMERGENCY RESP 800-468-1760 (24 HR). IF UNDELIVERABLE RETURN TO GENERATOR. SK COSP AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY. MO ID CES06 MC644-44-1273 SKDOT# A: 185166 B: C: D:											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.											
Printed/Typed Name David Donnan						Signature David Donnan			Month Day Year 06/04/06		
17. Transporter 1 Acknowledgement of Receipt of Materials											
Printed/Typed Name Scott Carthen						Signature Scott Carthen			Month Day Year 06/04/06		
18. Transporter 2 Acknowledgement of Receipt of Materials											
Printed/Typed Name David Donnan						Signature David Donnan			Month Day Year 06/04/06		
19. Discrepancy Indication Space Lic # 99882 mp											
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.											
Printed/Typed Name M. Anderson						Signature M. Anderson			Month Day Year 06/04/06		

5-085-02

Please print or type. (Form designed for use on 11x17 (12-pitch) typewriter.)

Form Approved OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MOR000522748	2. Page 1 of 1	3. Emergency Response Phone 1-800-468-1760	4. Manifest Tracking Number 000219325 CEX
5. Generator's Name and Mailing Address TRIUMPH FOODS 5302 STOCKYARDS EXPRESSWAY SAINT JOSEPH MO 64504 Generator's Phone: 816-396-2825					
6. Transporter 1 Company Name SAFETY-KLEEN SYSTEMS, INC				U.S. EPA ID Number MOD980973564	
7. Transporter 2 Company Name Safety-Kleen Systems				U.S. EPA ID Number TXR 000050930	
8. Designated Facility Name and Site Address SAFETY-KLEEN SYSTEMS, INC. 3700 LAGRANGE ROAD SMITHFIELD KY 40068 Facility's Phone: 502-845-2453				U.S. EPA ID Number KYD053348108	
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity
	X	1. RO WASTE FLAMMABLE LIQUIDS, CORROSIVE, N.O.S. (CYCLOHEXANE, ACETIC ACID) 3(8) UN2924 PG II (D001, D002) (ERG#132)	001 DF		012
	2.				
	3.				
	4.				
12. Waste Codes D001 D002					
14. Special Handling Instructions and Additional Information SK TRCK#107915786 0003035240					
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/packaged, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator's/Officer's Printed/Typed Name VIKAS GILL					
Signature Vikas Gill					
Month Day Year 06/15/07					
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____				
	Transporter signature (for exports only):				
	17. Transporter Acknowledgment of Receipt of Materials				
Transporter 1 Printed/Typed Name Scott Carthen					
Signature Scott Carthen					
Month Day Year 06/15/07					
Transporter 2 Printed/Typed Name Dave Carlisle					
Signature Dave Carlisle					
Month Day Year 06/19/07					
DESIGNATED FACILITY	18. Discrepancy				
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection				
	Manifest Reference Number: _____ U.S. EPA ID Number: _____				
	18b. Alternate Facility (or Generator) Facility's Phone: _____				
	18c. Signature of Alternate Facility (or Generator) Month Day Year 06/24/07				
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
1. 2. 3. 4.					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18b					
Printed/Typed Name K. Ridd					
Signature K. Ridd					
Month Day Year 06/24/07					



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MOR000522748	2. Page 1 of 1	3. Emergency Response Phone 1-800-468-1740	4. Manifest Tracking Number 000219325 CEX			
5. Generator's Name and Mailing Address TRIUMPH FOODS 5302 STOCKYARDS EXPRESSWAY SAINT JOSEPH MO 64504			Generator's Site Address (if different than mailing address)					
6. Transporter 1 Company Name SAFETY-KLEEN SYSTEMS, INC			U.S. EPA ID Number MOD980973564					
7. Transporter 2 Company Name			U.S. EPA ID Number					
8. Designated Facility Name and Site Address SAFETY-KLEEN SYSTEMS, INC. 3700 LAGRANGE ROAD SMITHFIELD KY 40065			U.S. EPA ID Number 000653 KYD053348108					
Facility's Phone: 502-845-2453								
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
	X	1. 140 WASTE FLAMMABLE LIQUIDS, CORROSIVE, N.O.S. (CYCLOHEXANE, ACETIC ACID) 3(8) UN2924 PG II (D001, D002) (ERG#132)	1. 601 DF		1. 120	G	D001	D002
		2.						
		3.						
		4.						
14. Special Handling Instructions and Additional Information SK TRUCK#107915786 0003035240								
SK AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offeror's Printed/Typed Name			Signature			Month Day Year 06/15/97		
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
	17. Transporter Acknowledgment of Receipt of Materials							
	Transporter 1 Printed/Typed Name Keith Smith			Signature <i>Keith Smith</i>			Month Day Year 06/15/97	
	Transporter 2 Printed/Typed Name			Signature			Month Day Year	
DESIGNATED FACILITY	18. Discrepancy							
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
	18b. Alternate Facility (or Generator)						U.S. EPA ID Number	
	Facility's Phone:							
	18c. Signature of Alternate Facility (or Generator)						Month Day Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1.		2.		3.		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a								
Printed/Typed Name			Signature			Month Day Year		

on file (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039

MANIFEST

21. Generator ID Number

H0R000522748

22. Page

2

23. Manifest Tracking Number

JUMPH FOODS
02 STOCKYARDS EXPRESSWAY
SAINT JOSEPH

MO 64504

Company Name

Tri-state Motor Transit

U.S. EPA ID Number

MO0095038988

Company Name

U.S. EPA ID Number

24. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number,
Packing Group (if any))

28. Containers

No.

Type

29. Total
Quantity30. Unit
wt./vol.

31. Waste Codes

32. Special Handling Instructions and Additional Information

MFST R/T# 107915786 C# 0003-0352-40

33. Transporter Acknowledgment of Receipt of Materials

Printed/Typed Name

Donald L Hill

Signature

Donald L Hill

Month Day Year

10/22/07

34. Transporter Acknowledgment of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

GENERATOR

TRANSPORTER

DESIGNATED FACILITY



Stop Ticket

1 of 1

Stop#: 982534-9000

Pick-up: 04/14/08 - 04/14/08

Trip#: 699109

Actual Miles _____

Site# 117378

EPA ID#: MORU00522748

PD#: HACH



COPY

HPS (800)552-5986

Name Ch. [unclear] Signature _____ Date 4-14-08

Mailing Address

Site Address (SEN)

TRIUMPH FOODS
 TRIUMPH FOODS
 5302 STOCKYARDS EXPY
 SAINT JOSEPH, MO 64504

5302 STOCKYARDS EXPY
 SAINT JOSEPH, MO 64504
 Phone# (816)396-2746
 SUSAN STANDIFERD - 970/669-3050

Directions:

Transporter: 9000
 HERITAGE TRANSPORT, LLC
 IND058484114

US DOT# 314460

Phone
 (317)486-2973
 MC#

Pickup Demurrage _____

Driver# 2792

Emergency Rate _____

Tractor# 597

Final Delivery Demurrage _____

Trailer# 32 14

Reason for Missed Pickup:

- ☐ No room on truck/incompatibility issue
☐ Traffic/weather/construction/etc
☐ Customer not available/ready
☐ No/wrong paperwork, directions, or contact

- ☐ Delayed at prior stop
☐ Rescheduled by cust
☐ Truck/equip unavail/incorrect
☐ Other

Reason for Delay at Stop:

- ☐ Nonconformance (container issues)
☐ Nonconformance (paperwork issues)
☐ Request to ship more than scheduled

- ☐ Truck/equip malfunction/incorrect
☐ Material/personnel not avail for pick up
☐ Other

Driver Name Richard Loy Date 4-14-08

Deliver To: 9000
 HERITAGE ENVIRONMENTAL SERVICES LLC
 7901 WEST MORRIS STREET, INDIANAPOLIS IN 46231
 Directions:

IND093219012
 (317)243-0811

P/U	Items	Common Name	See Manifest	Transaction Prod	Ref#	Ord	Type
	1	SPENT COD TEST SOLUTION	000175037WAS-1	1832960 5861	YIN	1	DF

GPL INSTRS: CALL DAY B4 PICKUP.

FORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MDR00052E748	2. Page 1 of 2	3. Emergency Response Phone (800) 326-1221	4. Manifest Tracking Number 000175037WAS		
5. Generator's Name and Mailing Address 3302 STOCKYARDS EXPY SAINT JOSEPH, MO 64504 (816) 396-2746				Generator's Site Address (if different than mailing address) 3302 STOCKYARDS EXPY SAINT JOSEPH, MO 64504 GEN: 117378			
Generator's Phone:				SURVEY: 84539			
6. Transporter 1 Company Name HERITAGE TRANSPORT, LLC				U.S. EPA ID Number IND058404114			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address INDIANAPOLIS ENVIRONMENTAL SERVICES LLC 7301 WEST MORRIS STREET INDIANAPOLIS, IN 46231 (317) 243-0811				U.S. EPA ID Number IND093219012			
Facility's Phone:							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
			No.	Type			
	X	1. RD, UN3264, WASTE CORROSIVE LIQUID, ACIDIC, INORGANIC, N.O.S., 8, PBIII, (SULFURIC ACID, CHROM., MERCURY, SILVER), (DO09 D011), ERB8154,	1	DF	28	P	D002 D007 D009 D011
		2.					
		3.					
		4.					
14. Special Handling Instructions and Additional Information 1. UN 0471620 (1) 7232643 [117178016]							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offeror's Printed/Typed Name				Signature		Month Day Year	
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____						
	17. Transporter Acknowledgment of Receipt of Materials						
	Transporter 1 Printed/Typed Name		Signature		Month Day Year		
				04 14 08			
Transporter 2 Printed/Typed Name		Signature		Month Day Year			
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Manifest Reference Number: _____						
	18b. Alternate Facility (or Generator)				U.S. EPA ID Number		
	Facility's Phone:						
18c. Signature of Alternate Facility (or Generator)							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. NO10		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name				Signature		Month Day Year	

HAZARDOUS WASTE MANIFEST
(Continuation Sheet)

21. Generator ID Number

M01900032748

22. Page

of 2

23. Manifest Tracking Number

000175037NAG

24. Generator's Name

TRIUMPH FOODS / LENNY BERSTINE
5302 STOCKYARDS EXPY
SAINT JOSEPH, MO 64504

TRIUMPH FOODS / LENNY BERSTINE
5302 STOCKYARDS EXPY
SAINT JOSEPH, MO 64504

25. Transporter Company Name

U.S. EPA ID Number

26. Transporter Company Name

U.S. EPA ID Number

27a.
HM

27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

28. Containers

No.

Type

29. Total
Quantity

30. Unit
Wt./Vol.

31. Waste Codes

1. (1x5g)(F)

XXX

XX

XXX

X

XXXX

XXXX

XXXX

XXXX

XXXX

XXXX

32. Special Handling Instructions and Additional Information

33. Transporter Acknowledgment of Receipt of Materials

Printed/Typed Name

Signature

Month

Day

Year

34. Transporter Acknowledgment of Receipt of Materials

Printed/Typed Name

Signature

Month

Day

Year

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

GENERATOR

TRANSPORTER

DESIGNATED FACILITY



HESLDR1

LAND DISPOSAL RESTRICTIONS (LDR)
NOTICE AND CERTIFICATIONPage 1 of 1Generator Name: Triumph Foods - 117378EPA I.D. No.: MOR 000522748Manifest Tracking No.: 020175037WAS

Waste Stream Number: _____

(1) Manifest Page/Line Item	(2) Hazardous Waste Codes ^A	(3) Wastewater Or Non- Wastewater (Circle One) ^B	(4) Subcategory (if applicable) ^C	(5) Constituents Reference (Identify Chemicals: Enter "NONE" or "NA") ^D	(6) Applicable Certification (One per line) ^E
1-01	D002	<u>WW</u> NWW	5	NA	1
↓	D007, D011	<u>WW</u> NWW	49	NA	1
↓	D009	<u>WW</u> NWW	14	NA	1
		WW NWW			
		WW NWW			
		WW NWW			
		WW NWW			
		WW NWW			
		WW NWW			
		WW NWW			
		WW NWW			
		WW NWW			
		WW NWW			
		WW NWW			
		WW NWW			

^A Multiple waste codes allowed on a single line if the same information in Columns 3 through 6 applies to the waste code set. To list additional waste codes complete a Heritage LDR Continuation Form (HESLDR2). Review the Heritage Supplemental F001-F005 Spent Solvent/Underlying Hazardous Constituent/F039 Leachate Form (HESLDR3) and enter numeric constituent reference if one or more applicable waste codes are F001, F002, F003, F004, F005, F039, or D001-D043 or if you choose to use HESLDR3, please place an "X" in the Box.

^B Circle either "WW" - Wastewater or "NWW" - Non-Wastewater based on the waste that is being shipped.

^C Enter the Subcategory(ies) applicable to the waste code (See Instructions for Table of Subcategories or 40 CFR 268.40). A numerical entry from the Table of Subcategories in the Instructions is acceptable. Leave blank or enter "NA" if there is not a Subcategory.

^D Enter "NA" for all Hazard Codes other than D001-D043, F001-F005, and F039, Contaminated Soil, Hazardous Debris, and Decharacterized Waste. For these codes or waste types, either enter the numerical chemical representation from the Heritage Supplemental F001-F005 Spent Solvent/Underlying Constituents/F039 Leachate Form (HESLDR3) or the chemical name(s). If you choose to use the form HESLDR3 please place an "X" in the Box in Column 5 and complete HESLDR3 by identifying constituents using the appropriate Manifest Page/Line Item. If there are no constituents requiring identification enter "NONE" in Column 5.

^E Choose from certifications at bottom of HESLDR1 and enter number. Supplemental certifications may be required and are provided on form HESLDR4 in the instructions. Enter only one Certification Number per line.

See Instructions for Additional Information

If you have a decharacterized waste, contaminated soil, hazardous debris, lab packs managed by the Alternative Treatment Standard, a waste subject to an exemption, or operate a treatment facility please refer to certifications on HESLDR4 and enter the appropriate certification number. For Certifications (3) and (10a), HESLDR4 must accompany HESLDR1.

(1) Waste Does Not Meet Applicable Treatment Standards - This is a restricted waste that does not meet the applicable treatment standards set forth in Subpart D of 40 CFR Part 268.

(2) Waste Meets Applicable Treatment Standards - I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

I certify that the information provided on this and any additional pages (HESLDR2; HESLDR3, HESLDR4) of this LDR notification is true, accurate and complete.

Authorized Signature: Chris LathPrint or Type Name: Chris LathCompany/Title: Triumph Foods Wastewater SupervisorDate: 4/14/09

**COPY***5/26/09 82*

Generator Mailing Address :

Facility : HERITAGE ENVIRONMENTAL SERVICES LLC
7901 WEST MORRIS STREET
INDIANAPOLIS, IN 46231

(317)243-0811

IND093219012

Stop : 982594

LENNY BERSTINE
TRIUMPH FOODS
5302 STOCKYARDS EXPY
SAINT JOSEPH, MO. 64504
UNITED STATES

Certificate of Proper Management

HERITAGE ENVIRONMENTAL SERVICES, LLC CERTIFIES AND ASSURES TO OUR CUSTOMERS THAT THE TRANSACTION DESCRIBED, INCLUDING TREATMENT AND/OR STORAGE AND/OR RECLAMATION AND/OR RECYCLING AND/OR DISPOSAL SHALL BE HANDLED IN COMPLIANCE WITH ALL APPLICABLE LOCAL, STATE, AND FEDERAL LAWS AND REGULATIONS.

Generator Site Address : Gen# : 117378

DOCUMENT : 000175037WAS

TRIUMPH FOODS
5302 STOCKYARDS EXPY
SAINT JOSEPH, MO 64504

EPA ID NUMBER : MOR000522748

DATE RECEIVED : 16-MAY-08

Wastes/ream	# Containers	Total Pounds
1 SPENT COD TEST SOLUTION	1	32
Totals	1	32



Over 100 Years of Service

Actual Miles _____



COPY

100-100000-10000

Name Chris Latta Signature Chris Latta Date 3-4-09

Routing Address:

Site Address _____

RECEIVED FROM:
NAME: Chris Latta, Esq.
CITY: BOSTON, MA 02108

RECEIVED FROM:
NAME: Chris Latta, Esq.
CITY: BOSTON, MA 02108
PHONE: (617) 552-1234
FAX: (617) 552-1235

Address: 123 Main Street

City: Boston, MA 02108

Phone: _____

Business Hours: 9:00 AM - 5:00 PM

Fax: (617) 552-1235

UP DATA 3/4/09

Invoice Number: _____ Received: _____

Invoice Date: _____ Received Date: _____

Invoice Amount: _____ Received Amount: _____

Payment Method: _____ Date: _____

Payment Reference: _____

OFFICIAL LITIGATION VERIFIED FOR
ALL CASES HANDLED, INFORMATION IN ALL
Instances

100-100000-10000
01/10/09-0011

From: Customer Name: _____ Sent: Mon Feb 23/09 10:00 AM
To: _____ Transaction ID: 100-100000-10000
CC: _____ Date: 3/4/09
The system will not be disrupted.

FORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MDR000522748	2. Page 1 of 2	3. Emergency Response Phone (800) 326-1221	4. Manifest Tracking Number 000233054WAS
5. Generator's Name and Mailing Address TRIUMPH FOODS / LENNY BERSTINE 5302 STOCKYARDS EXPY SAINT JOSEPH, MO 64504 (816) 396-2746			Generator's Site Address (if different than mailing address) TRIUMPH FOODS / LENNY BERSTINE 5302 STOCKYARDS EXPY SAINT JOSEPH, MO 64504 SEN: 117378 SURVEY: 92643		
6. Transporter 1 Company Name HERITAGE TRANSPORT, LLC			U.S. EPA ID Number IND058484114		
7. Transporter 2 Company Name			U.S. EPA ID Number		
8. Designated Facility Name and Site Address HERITAGE ENVIRONMENTAL SERVICES LLC 7901 WEST MORRIS STREET INDIANAPOLIS, IN 46231 (317) 843-0811			U.S. EPA ID Number IND093219012		
Facility's Phone:					
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity
			No.	Type	12. Unit Wt./Vol.
	X	1. RD, UN3264, WASTE CORROSIVE LIQUID, ACIDIC, INORGANIC, N.O.S., 8. PGII, (SULFURIC ACID, CHROM., MERCURY, SILVER), (DO09 DO11), ERG#154,	1	DF	28
		2.			
		3.			
		4.			
13. Waste Codes DO02 DO07 DO09 DO11					
14. Special Handling Instructions and Additional Information 1. IN 047162B (1) 7234457					
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator's/Offers Printed/Typed Name Chris Latta		Signature <i>Chris Latta</i>		Month Day Year 03 24 09	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:					
17. Transporter Acknowledgment of Receipt of Materials					
Transporter 1 Printed/Typed Name Dawn C. Sump		Signature <i>Dawn C. Sump</i>		Month Day Year 03 24 09	
Transporter 2 Printed/Typed Name		Signature		Month Day Year	
18. Discrepancy					
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
Manifest Reference Number:					
18b. Alternate Facility (or Generator) U.S. EPA ID Number					
Facility's Phone:					
18c. Signature of Alternate Facility (or Generator) Month Day Year					
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
1. HOLD		2.		3.	
				4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a					
Printed/Typed Name Mickie / Okere		Signature <i>Mickie / Okere</i>		Month Day Year 03 23 09	

EPA Form 8700-22A (Rev. 3-05) Previous editions are obsolete.



HESLDR1

LAND DISPOSAL RESTRICTIONS (LDR)
NOTICE AND CERTIFICATIONPage 1 of 1Generator Name: HACH-Triumph Foods - 117378EPA I.D. No.: MORC00522748Manifest Tracking No.: 00023305412AS

Waste Stream Number: _____

(1) Manifest Page/Line Item	(2) Hazardous Waste Codes ^A	(3) Wastewater Or Non Wastewater (Circle One) ^B	(4) Subcategory (if applicable) ^C	See HESLDR3	(5) Constituents Reference (Identify Chemicals, Enter "NONE" or "NA") ^D	(6) Applicable Certification (One per line) ^E
1-01	D002	WW (NWW)	15		NA	1
↓	D001, D011	WW (NWW)	49		NA	1
↓	D009	WW (NWW)	14		NA	1
		WW NWW				
		WW NWW				
		WW NWW				
		WW NWW				
		WW NWW				
		WW NWW				
		WW NWW				
		WW NWW				
		WW NWW				
		WW NWW				
		WW NWW				
		WW NWW				

^A Multiple waste codes allowed on a single line if the same information in Columns 3 through 6 applies to the waste code set. To list additional waste codes complete a Heritage LDR Continuation Form (HESLDR2). Review the Heritage Supplemental F001-F005 Spent Solvent/Underlying Hazardous Constituent/F039 Leachate Form (HESLDR3) and enter numeric constituent reference if one or more applicable waste codes are F001, F002, F003, F004, F005, F039, or D001-D043 or if you choose to use HESLDR3, please place an "X" in the Box.

^B Circle either "WW" - Wastewater or "NWW" - Non-Wastewater based on the waste that is being shipped.

^C Enter the Subcategory(ies) applicable to the waste code (See Instructions for Table of Subcategories or 40 CFR 268.40). A numerical entry from the Table of Subcategories in the Instructions is acceptable. Leave blank or enter "NA" if there is not a Subcategory.

^D Enter "NA" for all Hazard Codes other than D001-D043, F001-F005, and F039, Contaminated Soil, Hazardous Debris, and Decharacterized Waste. For these codes or waste types, either enter the numerical chemical representation from the Heritage Supplemental F001-F005 Spent Solvent/Underlying Constituents/F039 Leachate Form (HESLDR3) or the chemical name(s). If you choose to use the form HESLDR3 please place an "X" in the Box in Column 5 and complete HESLDR3 by identifying constituents using the appropriate Manifest Page/Line Item. If there are no constituents requiring identification enter "NONE" in Column 5.

^E Choose from certifications at bottom of HESLDR1 and enter number. Supplemental certifications may be required and are provided on form HESLDR4 in the instructions. Enter only one Certification Number per line.

See Instructions for Additional Information

If you have a decharacterized waste, contaminated soil, hazardous debris, lab packs managed by the Alternative Treatment Standard, a waste subject to an exemption, or operate a treatment facility please refer to certifications on HESLDR4 and enter the appropriate certification number. For Certifications (3) and (10a), HESLDR4 must accompany HESLDR1.

(1) Waste Does Not Meet Applicable Treatment Standards - This is a restricted waste that does not meet the applicable treatment standards set forth in Subpart D of 40 CFR Part 268.

(2) Waste Meets Applicable Treatment Standards - I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

I certify that the information provided on this and any additional pages (HESLDR2; HESLDR3; HESLDR4) of this LDR notification is true, accurate and complete.

Authorized Signature: Chris LattaPrint or Type Name: Chris LattaCompany/Title: Triumph FoodsDate: 3-4-09

City of St. Joseph, Missouri
Water Pollution Control

5-26-09
SE

Wastewater Contribution Permit

Permit No. 08-05-01

In accordance with the provisions set forth in Chapter 29, Article IV of the Code of Ordinances for the City of St. Joseph and applicable state and federal regulations, the industrial user described below (and hereinafter referred to as "Permittee") is hereby granted permission to discharge sanitary and industrial wastewater into the publicly owned treatment works (POTW) of the City of St. Joseph, Missouri.

Company Name:	Triumph Foods, LLC.
Premise Address:	5302 Stockyards Expressway St. Joseph, MO 64504
Industry Description:	Slaughter of hogs and fabrication, packaging and shipping of resulting pork products. Rendering of pork fat for edible lard and rendering of inedible pork materials, inedible fat, blood and biological solids from the wastewater treatment process into inedible products for sale.
Applicable NAICS Code:	311611 and 311613
Applicable Federal Regulations:	40 CFR 403 and 432.26

Discharge from the above industrial user shall be in accordance with the conditions set forth in this permit, which consists of Sections A through F, including any applicable appendices, references or attachments.

Compliance with this permit does not relieve Permittee of any obligation to comply with applicable local, state or federal regulations, including any such regulations that may become effective during the term of this permit. Noncompliance with any term or condition of permit shall constitute a violation of Chapter 29, Article IV of the Code of Ordinances this for the City of St. Joseph and may subject Permittee to enforcement action pursuant thereto.

This permit is based upon information provided by Permittee in their application for this permit or gathered by representatives of the City of St. Joseph, Missouri. New permit conditions may be required if significant changes occur to the underlying information, applicable regulations, or discharge characteristics.

This permit becomes effective on **September 1, 2005**, and expires at midnight on **August 31, 2010**.

Section A
General Definitions

1. "CFR" means the Code of Federal Regulations.
2. "City" means the City of St. Joseph, Missouri.
3. "City Code" means the Code of Ordinances for the City of St. Joseph, Missouri. A copy of this code is included in the Appendix to this permit.
4. "Daily Maximum" means the total discharge by mass or average concentration during a 24-hr period.
5. "Department" means the City of St. Joseph, Missouri, Department of Public Works.
6. "Director" means the director of public works designated by the City to administer and enforce the provisions of Chapter 29 of the City Code or the person designated by the city to supervise the operation of the publicly owned treatment works and who is charged with certain duties and responsibilities by Chapter 29 of the City Code, or his duly authorized representative.
7. "EPA" means the United States Environmental Protection Agency.
8. "Flow-Proportional Sample" means a combination of individual samples in which the volume of each sample is proportional to the discharge flow. Alternatively, the sample frequency is proportional to the flow rate of the sample period.
9. "gpd" means gallons per day.
10. "Grab Sample" means an individual sample collected over a period of time not exceeding fifteen (15) minutes.
11. "Grab-Composite Sample" means a combination of discrete grab equal volume samples at periodic intervals over a specific period.
12. "May" means permissive.
13. "mg/l" means milligrams per liter and is equivalent to parts per million (ppm).
14. "Monthly Average" means the arithmetic mean of the mass or concentration values for effluent samples collected in a period of thirty (30) consecutive days.
15. "pH" means the logarithm of the reciprocal of the hydrogen ion concentration in moles per liter.

16. "POTW" means publicly owned treatment works which is a treatment works as defined by Section 212 of the Clean Water Act (33 USC 1292), or any subsequent amendments thereto, which is owned in this instance by the City. This definition includes any facilities for collecting, transporting, pumping, treating and disposing of sewage. This includes any sewers except building sewers that convey wastewater to the POTW treatment plant, but does not include pipes, sewers or other conveyances not connected to a POTW facility providing treatment. For the purposes of this permit, "POTW" also includes any sewers that convey wastewater to the POTW from persons outside the City who are, by contract or agreement with the city, users of the City's POTW.
17. "ppd" means pounds per day.
18. "Shall" or "Must" means mandatory.
19. "Slug" means any discharge of sanitary or industrial wastewater having a concentration of any constituent sufficiently above average and for a period to be considered by the Director as harmful to the collection system or the performance of the POTW.
20. "State" means the State of Missouri.
21. "Time-proportional Samples" means a combination of individual samples in which the volume of each sample is collected over a predetermined time interval during those days, and hours of the day, of normal plant operation with the normal pollutant producing operations occurring.

Specialized Definitions

1. "Fabrication," as applied to the meat-packing industry, means the butchering, cutting, and trimming of meat, poultry, fish and game.
2. "Process Wastewater" means any water which, during manufacturing or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, by-product, or waste product.

Section B – Monitoring Facilities and Pretreatment Systems

1. Outfalls, Sample Points and Flow Measurement – The following table describes the outfalls and locations that shall be used for wastewater sampling under this permit and the facilities that shall be used for flow measurement. Sampling locations shall be accessible and kept clear of obstructions at all times.

Outfall Designation	GPS Coordinates	Sample Point Description	Flow Measurement
TFA	To be determined after construction is complete	The force main from Permittee's pretreatment system discharges from a dedicated line at the POTW into the industrial splitter box. Samples shall be collected from the dedicated line located between roughing filters #3 and #4. This line represents the pretreated process wastestream.	Discharge flow from this outfall shall be measured using a properly calibrated discharge flow meter. ^A
TFB	To be determined after construction is complete	This sample point represents the sanitary line and truck wash wastestream which discharges to Brown's Branch pump station. Sampling is not routine. Any samples taken will be from a manhole located on the southeast corner of the property prior to passing beneath 759 Highway to the east.	Discharge flow from this outfall shall be measured using a properly calibrated discharge flow meter. ^A
TFC	To be determined after construction is complete	This sample point represents the same pretreated process wastestream as TFA, but is located at Triumph Foods. Samples shall be taken from a sampling port on the discharge pipe of the final effluent discharge pump station located in the wastewater treatment building.	Discharge flow from this outfall shall be measured using a properly calibrated discharge flow meter. ^A

2. Sampling Equipment – Composite samples shall be collected using automatic composite samplers such as ISCO 3700 or equivalent equipment. Grab samples shall be collected using appropriate grab sampling equipment.

Wastewater samples shall be collected in accordance with EPA guidelines set forth in 40 CFR 136. Semianual samples collected by the Department will be split with Permittee. Permittee is required to submit their split sample to an approved laboratory for analyses.

^A Meter shall be maintained and calibrated in accordance with City Code §29-239.
08-05-01 Permit

3. Pretreatment Systems – Permittee shall employ the following pretreatment systems and procedures:

- a) In accordance with City Code §29-161, Permittee shall control accidental discharges to the POTW through the use of secondary spill containment structures and other appropriate measures outlined in an "Accidental Discharge/Slug Control Plan (ADSCP)." This plan shall be submitted to Water Pollution Control within 120 days of the effective date of this permit.
- b) All process wastewater shall be treated through Permittee's wastewater treatment system.

Grease-bearing wastewater is screened and pumped to Dissolved Air Flotation (DAF) #1 for removal of oil and grease and suspended solids. Effluent from DAF #1 flows by gravity to flow equalization basin (FEB) #1.

Non grease-bearing wastewater is pumped and screened. Screened non grease-bearing wastewater flows by gravity to FEB #1 where the grease-bearing and non grease-bearing wastestreams are mixed.

The combined wastestream is pumped to DAF #2 for removal of colloidal BOD₅, TSS and oil and grease. Effluent from DAF #2 flows by gravity to FEB #2. FEB #2 is mixed and aerated for removal of soluble BOD₅.

The wastewater is then pumped to DAF #3 for removal of biological solids and final treatment prior to discharge to the final effluent wet well. Treated Effluent is pumped from the final effluent wet well to the POTW. Screenings and sludge generated from the treatment processes will be sent to the rendering process to be rendered.

- c) In accordance with City Code §29-157(c), Permittee shall implement the following best management practices plans (BMPPs) to control the discharge of pollutants that may adversely impact the POTW.
 - Noncontact Heating or Cooling Water – Any chemicals added to noncontact heating or cooling water (boilers, cooling towers, etc.) shall be done so in accordance with an appropriate water chemistry management plan. Such a plan shall include provisions (proper chemical selection, dosage rates, blowdown flows, etc.) that will minimize pollutant loading to the POTW and prevent adverse impacts to the POTW. Molybdates shall not be used.
 - Lab Wastes – Spent or unused lab chemicals shall be disposed of in accordance with appropriate hazardous waste procedures. Only wastewater associated with glassware washing and water sample disposal shall be discharged to the POTW. Permittee shall observe other practices for minimizing pollutant discharge from laboratory activities in accordance with generally accepted laboratory practices

including those outlined in Permittee's standard operating procedures and policies for laboratory activities.

- Waste Oils and Solvents – Waste oils and solvents shall not be discharged to the POTW, but shall be hauled offsite for proper disposal or recycling.
- Solid Waste – Solid waste shall not be discharged to the POTW, but shall be handled by appropriate solid waste disposal procedures.
- Hazardous Waste – Hazardous waste shall not be discharged to the POTW, but shall be handled by appropriate hazardous waste disposal procedures.

Section C – Discharge Limits and Sampling Requirements

The following table summarizes the parameters, numerical discharge limits, sampling frequency and sample types that Permittee shall comply with at the specified sample point(s) for the duration of this permit.

Outfall	Parameter	Discharge Limit ^A		Minimum Sampling Requirements		
		Daily	Monthly	# of Samples ^B	Frequency	Sample Type
TFA	Arsenic, total	^C mg/l	^C mg/l	3	Semiannual	Composite ^D
TFA	Boron, total	^C mg/l	^C mg/l	3	Semiannual	Composite ^D
TFA	Cadmium, total	0.07 mg/l	^C mg/l	3	Semiannual	Composite ^D
TFA	Chromium, total	4.57 mg/l	^C mg/l	3	Semiannual	Composite ^D
TFA	Copper, total	1.64 mg/l	^C mg/l	3	Semiannual	Composite ^D
TFA	Cyanide, total	^C mg/l	^C mg/l	3	Semiannual	Grab
TFA	Lead, total	0.53 mg/l	^C mg/l	3	Semiannual	Composite ^D
TFA	Manganese, total	^C mg/l	^C mg/l	3	Semiannual	Composite ^D
TFA	Mercury, total	^C mg/l	^C mg/l	3	Semiannual	Composite ^D
TFA	Molybdenum, total	^C mg/l	^C mg/l	3	Semiannual	Composite ^D
TFA	Nickel, total	0.99 mg/l	^C mg/l	3	Semiannual	Composite ^D
TFA	pH ^E	5.0 to 10.5 SU	^C SU	3	Semiannual	Grab
TFA	Selenium, total	^C mg/l	^C mg/l	3	Semiannual	Composite ^D
TFA	Silver, total	1.75 mg/l	^C mg/l	3	Semiannual	Composite ^D
TFA	Temperature	150°F (65.6°C)	^C °F (°C)	3	Semiannual	Grab
TFA	Zinc, total	3.00 mg/l	^C mg/l	3	Semiannual	Composite ^D
TFA	Alkalinity (as CaCO ₃)	^C mg/l	^C mg/l	1	Semiannual	Grab
TFA	Ammonia (as N)	^C mg/l	^C mg/l	1	Semiannual	Composite ^D
TFA	Total Kjeldahl Nitrogen ^F (as N)	4014 lbs/day	^C mg/l	3	Semiannual	Composite ^D
TFA	Biochemical Oxygen Demand ^F	6881 lbs/day	^C mg/l	Daily, to be monitored by Water Pollution Control		Composite ^D
TFA	Total Suspended Solids ^F	8,027 lbs/day	^C mg/l	Daily, to be monitored by Water Pollution Control		Composite ^D
TFA	Fats, Oils and Grease ^F	2,294 lbs/day	^C mg/l	Twice monthly, monitored by Water Pollution control		Grab

^A Unless noted otherwise, limits reflect maximum allowable values established in City Code §29-157.

^B Indicated number of samples shall be collected within the same one-week period. All parameters with the same # of samples and frequency shall be monitored during the same sampling event.

^C Monitor only.

^D Composite samples shall be either flow-proportional or time-proportional.

^E Wastewater discharged to the POTW shall be within specified pH range at all times. pH is not to be averaged to determine compliance.

^F Daily limits based on maximum flow of 2.75-MG/day multiplied by 8.34 lbs/gallon multiplied by parameter limits in Wastewater Improvements Agreement with City of 300 mg/L B.O.D., 350 mg/L T.S.S., 100 mg/L F.O.G., and 175 mg/L T.K.N.

Outfall	Parameter	Discharge Limit ^A		Minimum Sampling Requirements		
		Daily	Monthly	# of Samples ^B	Frequency	Sample Type
TFA	Flow (discharged)	^G 2.90 million gal/day	80.0 million gal/month	1	Daily	Meter
TFB ^H	Flow (discharged)	^C gpd	^C gpd	1	Monthly	Meter
TFC	Sulfide	4.61 mg/l	^C mg/l	3	Semiannual	Grab

^G Both parties acknowledge that at full production (working 2 shifts, 6 days per week), projected flow rates are only estimates. The City has designed improvements at the POTW in anticipation of a daily peak flow of 2.75 MGD. Triumph Foods conservatively estimates that peak flow could reach 3.1 MGD. A daily discharge flow of 2.90 MGD has been established for the permit with the understanding that the permitted flow will be reviewed at 12 months from the start of production, and again at 18 months. If daily peak flows higher than 2.90 MGD appear necessary to meet production, then the City and Triumph Foods will need to discuss options to either attenuate daily peak flows from Triumph or pay for the cost of increased daily flow capacity.

^H Sampling at TFB outfall may be conducted randomly by WPC. Restrictions in Sewer Ordinance §29-156, general discharge prohibitions, and § 29—157 (a), local limits, apply at this sample point also. Any samples pulled at this location may be split with Permittee at Permittee's request.

Section D – Reporting and Notification Requirements

1. Submittal Address – All written reports and correspondence required by this permit shall be submitted to the following address, unless specifically indicated otherwise:

Industrial Pretreatment
Water Pollution Control
3500 State Route 759
St. Joseph, MO 64504

2. Signatory and Certification – All reports required under this permit must be signed by an authorized representative as defined in City Code §29-131(3) and contain the certification statement indicated in City Code §29-168.
3. Notification of Changed Conditions – In accordance with City Code §29-187(c), Permittee shall notify the Director, in writing, at least thirty (30) days prior to any planned significant change to Permittee's operations or systems which might alter the nature, quality or volume of wastewater discharged to the POTW. For purposes of this requirement, significant changes include, but are not limited to, flow increases of 20% or greater, the discharge of any previously unreported pollutants, and new or significant increases in production processes.
4. Notification of Accidental Discharge – In accordance with City Code §29-161(c) and (d), ~~in the case of an accidental discharge, Permittee shall immediately notify the treatment plant operator on duty at the City's Water Pollution Control facility. This notification shall include the location of the discharge, type of waste, concentration of pollutants, volume of waste, corrective actions taken, and any other information required by the plant operator to implement corrective countermeasures. Within five (5) working days following an accidental discharge, Permittee shall submit to the Director a detailed written report describing the cause of the discharge and the measures to be taken by Permittee to prevent similar future occurrences.~~

In accordance with City Code §29-161(e), a notice shall be permanently posted on Permittee's bulletin board, or other prominent place, advising employees whom to call if a dangerous discharge occurs. Employer shall ensure that all employees who may cause to occur or suffer from such a dangerous discharge are advised of the emergency notification procedure.

5. Notification of Noncompliance – If for any reason Permittee does not comply with or will be unable to comply with any condition of this permit, Permittee shall notify the Department within 24 hours of becoming aware of such noncompliance. Permittee shall submit to the department a report describing in detail the causes for noncompliance, the

period of noncompliance (dates and times) and the actions being taken to eliminate and prevent reoccurrence of the noncompliant discharge.

6. Self-Reported Discharge Limit Violation - In accordance with City Code §29-158, if sampling performed under this permit indicates a violation, Permittee shall notify the Department within 24 hours of becoming aware of the violation. Permittee shall also repeat the sampling and analysis for the non-compliant parameter(s) and submit the results of the repeat sampling within 30 calendar days after becoming aware of the violation. Permittee is not required to resample if the Department performs monitoring for the non-compliant parameter(s) at least once per month, or if the Department performs sampling between the initial sampling event that indicated the violation and when Permittee received the results from the initial sampling event.
7. Periodic Compliance Reports - Permittee shall submit two periodic compliance reports each year. The first report shall be for the period of January 1st through June 30th, and is due no later than July 31st. The second report shall be for the period of July 1st through December 31st and is due no later than January 31st. In accordance with City Code §29-158(c), Permittee shall be deemed in significant noncompliance for reports received later than 30 days past the above due dates.

This report shall include all chemical analyses performed on wastewater discharged to the POTW since the last periodic compliance report. At a minimum, the report shall include the chemical analyses for the parameters regulated by this permit at the frequency specified in Section C – Wastewater Sampling and Flow Measurement Requirements. Additional parameters or analyses performed more frequently than required by this permit shall also be included in the report.

In accordance with City Code §29-192(d), the report shall include discharge flow data. The flow data do not necessarily have to completely span the January 1st through June 30th or July 1st through December 31st periods mentioned above. However, flow data shall be provided for the six (6) months prior to the report date. At a minimum, discharge flow data corresponding to each sampling event shall be provided. The flow data shall include regulated process flow, unregulated stream flow rates and dilution stream flow rates, where applicable.

If Permittee is regulated by production-based standards, the report shall include applicable production data for the reporting period. At a minimum, production data corresponding to each sampling event shall be provided.

Section E – Special Conditions and Requirements

1. Baseline Monitoring Report – The Department acknowledges receipt of Permittee's Industrial Survey Questionnaire received April 26, 2005, and the Baseline Monitoring Report received April 29, 2005, and considers these submittals as application for a Wastewater Discharge Permit.
2. Final Discharge Report – After 60 days (City Ordinance §29-192 (c)) and on or before 90 days (40 CFR 403.12 (d)) after the commencement of process wastewater discharge to the POTW, the Permittee shall submit a final discharge report to Water Pollution Control. This report shall include the following.
 - The average and maximum daily flows for both sanitary and process wastewater discharge outfalls since the commencement of process wastewater discharge.
 - The concentration of all pollutants regulated in this permit. A minimum of one sample must be taken for each regulated pollutant with the exception of pH, sulfide, and cyanide, which shall require a minimum of 4 grab samples each.
 - A statement signed by the Permittee's Authorized Representative and certified to by a qualified professional, stating whether the applicable pretreatment standards are being met on a consistent basis and, if not, what additional manufacturing, process or house-keeping procedures, operation and maintenance procedures, or pretreatment is necessary to bring the user into compliance with the applicable pretreatment standards or requirements.
3. Oil and Grease Interceptors – Permittee is to maintain an outdoor, subgrade grease interceptor for the employee cafeteria. No sanitary waste may be connected to the interceptor. The interceptor shall be inspected at a minimum frequency of once per week via the manholes at the top. If the total liquid capacity of the discharge side contains 25% or more of a combination of accumulated grease and solids, the interceptor must be pumped out for disposal.

Similarly, the Permittee shall maintain a subgrade oil and solids separator at the trailer wash. No sanitary waste may be connected to the separator. The separator must be inspected at a minimum frequency of once per month. If the total liquid capacity of the discharge side contains 25% or more of a combination of oil and solids, the separator must be pumped out for disposal.

Records of all inspections and pump-outs for the grease interceptor and the oil/solids separator shall be kept on site for inspection at the POTW's request. If, after a period of one year, experience shows that a pumping frequency less than the required inspection frequency is needed, the Permittee may request in writing that less frequent inspection be required. If the interceptor or separator shall require replacement at any time, the design shall be approved by the Department prior to installation.

Section F – General Conditions and Requirements

1. Prohibition of Pass Through or Interference – In accordance with City Code §29-156(a), 10 CSR 20-6.100(4)(A)1. and 40 CFR 403.5(a)(1), Permittee shall not introduce or cause to be introduced into the POTW any pollutant or wastewater, which, alone or in conjunction with a discharge(s) from other sources, causes pass through or interference of the POTW.
2. Permit Modifications - The Director may modify this permit at any time for good cause, including, but not limited to, the reasons listed in City Code §29-187(f). In accordance with City Code §29-190, Permittee will be notified regarding changes to the permit at least 30 calendar days prior to the effective date of change.
3. Permit Transfers – This permit may be transferred to a new owner or operator only if Permittee gives at least thirty (30) calendar days advance notice to the Director and the Director approves the wastewater discharge permit transfer. Such notice and review shall be in accordance with City Code §29-191.
4. Duty to Reapply – In accordance with City Code §29-190, Permittee shall apply for permit reissuance at least 180 calendar days prior to the expiration date of this permit.
5. Revocation of Permit – The Director may revoke this permit for good cause, including, but not limited to the reasons listed in City Code §29-187(g).
6. Accidental or Slug Discharges – In accordance with City Code §29-161, Permittee shall provide protection from the accidental or slug discharge of prohibited materials or other substances regulated by pretreatment standards. If required by the Director, Permittee shall develop, submit and implement an accidental discharge/slug control plan meeting the requirements of City Code §29-161.
7. Right of Entry – In accordance with City Code §29-194, Permittee shall allow the city or its representatives ready access at all reasonable times to all parts of the premises for the purposes of inspection, sampling, records examination and copying or in the performance of any of their duties. Reasonable hours shall include any time that Permittee has the potential to discharge waste to the POTW. Permittee shall allow the City, state and EPA to set up on Permittee's premises such devices as are necessary to conduct sampling inspection, compliance monitoring or metering operations. If Permittee has security measures in force which require proper identification and clearance before entering into the premises, Permittee shall make necessary arrangements so that upon presentation of suitable identification, personnel from the City, state and EPA will be permitted to enter, without delay, for the purposes of performing their specific responsibilities. Any temporary or permanent obstruction to safe and easy access to the facility to be inspected or sampled shall be promptly removed by Permittee at the request of the Director and shall not be replaced. The costs of clearing such access shall be born by Permittee. Unreasonable delays in allowing the Director access to Permittee's premises shall be a violation of this permit.

8. Representative Sampling -- All wastewater samples shall be representative of Permittee's discharge. Wastewater monitoring and flow measurement facilities shall be properly operated, kept clean and maintained in good working order at all times. The failure of Permittee to properly maintain monitoring facilities shall not be grounds for Permittee to claim that sample results are unrepresentative of its discharge.
9. Sampling and Analytical Requirements -- In accordance with City Code §29-193(b), all wastewater analyses required by this permit shall be in accordance with 40 CFR 136, or other methods approved by the Director. Sampling shall be carried out by customarily accepted methods to reflect the true characteristics of the wastewater.
10. Record Keeping -- In accordance with City Code §29-192(a), Permittee shall retain and make available for inspection and copying all records of information obtained pursuant to any wastewater monitoring activities, including but not limited to: flow measurement, chemical analysis and all records required by this permit that are involved in a legal dispute. Such records from sampling activities shall include:
 - a) The date, exact location, method and time of sampling and the name(s) of the person(s) taking the samples.
 - b) The dates the analyses were performed.
 - c) The name of the laboratory performing the analyses.
 - d) The results of such analyses.

These records shall remain available for a period of at least three (3) years or the duration of this permit, whichever is longer. This period shall be automatically extended for the duration of any litigation concerning Permittee or the City, or where the Director has specifically notified Permittee of a longer retention period.

11. Dilution Prohibition -- In accordance with City Code §29-160, Permittee shall never increase the use of potable or process water, or in any way attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in this permit.
12. Mass Loading Limits - At the discretion of the Director, daily maximum concentration limits (mg/l) may be converted to equivalent daily mass loading (ppd) limits.
13. Enforcement Actions - Any violation of this permit may result in enforcement actions, including civil and criminal penalties, as provided by Chapter 29, Article IV, Division 3, Subdivision IV of the City Code.
14. Compliance Schedule -- If Permittee requires additional or alternative pretreatment, manufacturing, processing, housekeeping or operation and maintenance (O&M) procedures

or systems to comply with applicable pretreatment standards or limitations, a schedule shall be developed for implementing such measures that will enable Permittee to achieve compliance. The compliance schedule shall meet the requirements set forth in City Code §29-192(b). Permittee shall submit progress reports as stipulated in City Code §29-192(b)(2) and a final compliance report as stipulated in City Code §29-192(c).

15. Duty to Comply – Compliance with this permit does not relieve Permittee of the responsibility to comply with all applicable federal, state, and local regulations, including those that may become effective during the effective term of this permit. Such regulations include, but may not be limited to:
- Federal Water Pollution Control Act, also known as the Clean Water Act, 33 USC 1251 et seq.
 - Title 40, Chapter I, Subchapter N of the Code of Federal Regulations.
 - Missouri Clean Water Law, Chapter 644 of the Missouri Revised Statutes.
 - Title 10, Division 20, Chapter 6, Rule 100 of the Missouri Code of State Regulations.
 - Chapter 29, Article IV of the Code of Ordinances for the City of St. Joseph.

Appendix

- A. **City Code** - *City of St. Joseph, Missouri Sewer Use & Industrial Pre-Treatment Ordinance*, Chapter 29 of the Code of Ordinances for the City of St. Joseph, Missouri.
- B. **Contact Information** – St. Joseph Water Pollution Control Emergency Contact Numbers.
- C. **Sulfide Test Methods** – Summary of Standard Methods 4500-S²⁻ C.



January 26, 2009
Control No. 126036
Page 1 of 7

Terra Renewal, LLC.
ATTN: Ms. Kelley Leonard
Post Office Box 3036
Russellville, AR 72811-3036

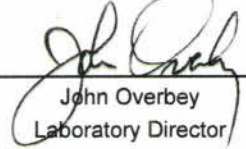
Dear Ms. Kelley Leonard:

Project Description: One (1) sludge sample(s) received on January 19, 2009
Triumph - St. Joseph, Mo.
P.O. No. 52473

This report is the analytical results and supporting information for the sample submitted to American Interplex Corporation (AIC) on January 19, 2009. The following results are applicable only to the sample identified by the control number referenced above. Accurate assessment of the data requires access to the entire document. Each section of the report has been reviewed and approved by the laboratory director or a qualified designee.

Data has been validated using standard quality control measures performed on at least 10% of the samples analyzed. Quality Assurance, instrumentation, maintenance and calibration were performed in accordance with guidelines established by the cited methodology.

AMERICAN INTERPLEX CORPORATION

By 
John Overbey
Laboratory Director

Enclosure(s): Chain of Custody

PDF cc: Terra Renewal, LLC.
ATTN: Mr. John Pipkin
johnp@terrarenewal.com

Terra Renewal, LLC.
ATTN: Mr. Gabe Timby
gabet@terrarenewal.com

Terra Renewal, LLC.
ATTN: Mr. Billy Staton
billys@terrarenewal.com

Terra Renewal, LLC.
ATTN: Vanya Colburn
vanya.colburn@terrarenewal.com



Terra Renewal, LLC.
Post Office Box 3036
Russellville, AR 72811-3036

CASE NARRATIVE

SAMPLE RECEIPT

Received Temperature: 2°C

Receipt Verification:	Complete Chain of Custody	Y
	Sample ID on Sample Labels	Y
	Date and Time on Sample Labels	Y
	Proper Sample Containers	Y
	Within Holding Times	Y
	Adequate Sample Volume	Y
	Sample Integrity	Y
	Proper Temperature	Y
	Proper Preservative	Y

QUALIFIERS

Qualifiers	Definition
D	Result is from a secondary dilution factor
H	Analytical holding time exceeded regulatory requirements
W	Result is presented on a Wet Weight Basis

References:

"Methods for Chemical Analysis of Water and Wastes", EPA/600/4-79-020 (Mar 1983) with updates and supplements EPA/600/5-91-010 (Jun 1991), EPA/600/R-92-129 (Aug 1992) and EPA/600/R-93-100 (Aug 1993).

"Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846)", Third Edition.

"Standard Methods for the Examination of Water and Wastewaters", 20th edition, 1998.

"American Society for Testing and Materials" (ASTM).

"Association of Analytical Chemists" (AOAC).

"Self-Davis and Moore" (2000).



Terra Renewal, LLC.
Post Office Box 3036
Russellville, AR 72811-3036

January 26, 2009
Control No. 126036
Page 3 of 7

ANALYTICAL RESULTS

AIC No. 126036-1

Sample Identification: Triumph - St. Joseph, Mo. 1-18-09 1630

Analyte	Method	Result	RL	Units	Batch	Qualifier
pH	EPA 9045C	5.6	-	Units	W27792	H
Volatile Solids	SM 2540 G	94	0.01	%	W27797	
Total Solids	SM 2540G	8.1	0.01	%	W27797	
Ammonia as N	SM 4500 NH3-BE	22000	25	mg/Kg	W27819	D
Total Kjeldahl Nitrogen	SM 4500-NH3 E	89000	130	mg/Kg	W27822	D
Arsenic	EPA 3051, 6010B	< 5	5	mg/Kg	S24747	
Cadmium	EPA 3051, 6010B	< 0.4	0.4	mg/Kg	S24747	
Copper	EPA 3051, 6010B	150	0.6	mg/Kg	S24747	
Lead	EPA 3051, 6010B	7.6	4	mg/Kg	S24747	
Molybdenum	EPA 3051, 6010B	4.3	0.8	mg/Kg	S24747	
Nickel	EPA 3051, 6010B	5.0	1	mg/Kg	S24747	
Phosphorus	EPA 3051, 6010B	7600	10	mg/Kg	S24747	
Potassium	EPA 3051, 6010B	3400	100	mg/Kg	S24747	
Selenium	EPA 3051, 6010B	< 7	7	mg/Kg	S24747	
Sodium	EPA 3051, 6010B	3300	100	mg/Kg	S24747	
Zinc	EPA 3051, 6010B	310	0.2	mg/Kg	S24747	
Mercury	EPA 7471A	< 0.1	0.1	mg/Kg	S24742	
Nitrate + Nitrite as N	EPA 9056	10	0.5	mg/Kg	S24741	
Oil and Grease	AR OG	5400	28	mg/Kg	C12752	W



Terra Renewal, LLC.
Post Office Box 3036
Russellville, AR 72811-3036

January 26, 2009
Control No. 126036
Page 4 of 7

SAMPLE PREPARATION REPORT

AIC No. 126036-1

Analyte	Date/Time Prepared By		Date/Time Analyzed By		Dilution	Batch	Qualifier
pH	20JAN09 0938	258	20JAN09 1040	258		W27792	H
Volatile Solids	20JAN09 1425	285	21JAN09 1612	285		W27797	
Total Solids	20JAN09 1425	285	21JAN09 1612	285		W27797	
Ammonia as N	22JAN09 1335	93	26JAN09 1056	93	1700	W27819	D
Total Kjeldahl Nitrogen	22JAN09 1335	93	26JAN09 1159	93	1100	W27822	D
Metals	21JAN09 1145	282	21JAN09 2036	270		S24747	
Metals	21JAN09 1145	282	22JAN09 1516	270		S24747	
Mercury	21JAN09 0813	282	21JAN09 0921	282		S24742	
Nitrate + Nitrite as N	20JAN09 1406	282	20JAN09 2155	257		S24741	
Oil and Grease			20JAN09 1400	07		C12752	W



Terra Renewal, LLC.
Post Office Box 3036
Russellville, AR 72811-3036

January 26, 2009
Control No. 126036
Page 5 of 7

SAMPLE DUPLICATE RESULTS

AIC No. 126036-1

Analyte	Method	Sample Result	Duplicate Result	Units	RPD	RPD Limit	Batch	Qualifier
Volatile Solids	SM 2540 G	94	94	%	0.0237	20	W27797	
Total Solids	SM 2540G	8.1	8.0	%	1.07	10	W27797	

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
pH	-	101/101	98-102	0.00	5	W27792	
Ammonia as N	1 mg/Kg	95.9/96.7	85-115	0.820	20	W27819	
Total Kjeldahl Nitrogen	5 mg/Kg	103/98.5	80-120	4.92	20	W27822	
Arsenic	5 mg/Kg	91.7/94.1	85-115	2.60	20	S24747	
Cadmium	5 mg/Kg	91.7/93.6	85-115	2.07	20	S24747	
Copper	0.5 mg/Kg	91.8/93.6	85-115	2.00	20	S24747	
Lead	5 mg/Kg	91.7/94.0	85-115	2.43	20	S24747	
Molybdenum	0.5 mg/Kg	93.1/95.4	85-115	2.46	20	S24747	
Nickel	0.5 mg/Kg	90.9/93.1	85-115	2.37	20	S24747	
Potassium	10 mg/Kg	99.4/99.6	85-115	0.385	20	S24747	
Selenium	5 mg/Kg	95.2/95.5	85-115	0.314	20	S24747	
Sodium	10 mg/Kg	104/106	85-115	1.48	20	S24747	
Zinc	0.5 mg/Kg	90.3/92.0	85-115	1.83	20	S24747	
Mercury	0.0025 mg/Kg	95.6/94.4	85-115	1.26	20	S24742	
Nitrate + Nitrite as N	10 mg/Kg	98.9/99.2	90-110	0.283	10	S24741	
Oil and Grease	800 mg/Kg	97.2/93.5	78-114	3.93	7.37	C12752	

MATRIX SPIKE SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Arsenic	492 mg/Kg	96.6/96.8	75-125	0.169	20	S24747	
Cadmium	492 mg/Kg	95.3/95.6	75-125	0.336	20	S24747	
Copper	49.2 mg/Kg	99.0/99.5	75-125	0.490	20	S24747	
Lead	492 mg/Kg	95.4/95.2	75-125	0.151	20	S24747	
Molybdenum	49.2 mg/Kg	99.0/98.5	75-125	0.453	20	S24747	
Nickel	49.2 mg/Kg	93.3/93.2	75-125	0.0465	20	S24747	
Potassium	983 mg/Kg	106/104	75-125	0.495	20	S24747	
Selenium	492 mg/Kg	96.6/96.6	75-125	0.0642	20	S24747	
Sodium	983 mg/Kg	104/103	75-125	0.711	20	S24747	
Zinc	49.2 mg/Kg	92.3/92.2	75-125	0.0107	20	S24747	
Mercury	1.22 mg/Kg	99.6/98.4	70-130	1.21	20	S24742	
Nitrate + Nitrite as N	99.1 mg/Kg	98.3/97.7	80-120	0.587	10	S24741	



Terra Renewal, LLC.
Post Office Box 3036
Russellville, AR 72811-3036

January 26, 2009
Control No. 126036
Page 6 of 7

LABORATORY BLANK RESULTS

Analyte	Method	Result	Units	RL	PQL	QC	
						Sample	Qual
Volatile Solids	SM 2540 G	< 0.01	%	0.01	0.01	W27797-1	
Total Solids	SM 2540G	< 0.01	%	0.01	0.01	W27797-1	
Ammonia as N	SM 4500 NH3-BE	< 2	mg/Kg	2	2	W27819-1	
Total Kjeldahl Nitrogen	SM 4500-NH3 E	< 10	mg/Kg	10	10	W27822-1	
Arsenic	EPA 3051, 6010B	< 5	mg/Kg	5	5	S24747-1	
Cadmium	EPA 3051, 6010B	< 0.4	mg/Kg	0.4	0.4	S24747-1	
Copper	EPA 3051, 6010B	< 0.6	mg/Kg	0.6	0.6	S24747-1	
Lead	EPA 3051, 6010B	< 4	mg/Kg	4	4	S24747-1	
Molybdenum	EPA 3051, 6010B	< 0.8	mg/Kg	0.8	0.8	S24747-1	
Nickel	EPA 3051, 6010B	< 1	mg/Kg	1	1	S24747-1	
Potassium	EPA 3051, 6010B	< 100	mg/Kg	100	100	S24747-1	
Selenium	EPA 3051, 6010B	< 7	mg/Kg	7	7	S24747-1	
Sodium	EPA 3051, 6010B	< 100	mg/Kg	100	100	S24747-1	
Zinc	EPA 3051, 6010B	< 0.2	mg/Kg	0.2	0.2	S24747-1	
Mercury	EPA 7471A	< 0.1	mg/Kg	0.1	0.1	S24742-1	
Nitrate + Nitrite as N	EPA 9056	< 0.5	mg/Kg	0.5	0.5	S24741-1	
Oil and Grease	AR OG	< 28	mg/Kg	28	28	C12752-1	



Terra Renewal, LLC.
Post Office Box 3036
Russellville, AR 72811-3036

January 26, 2009
Control No. 126036
Page 7 of 7

QUALITY CONTROL PREPARATION REPORT

DUPLICATE SAMPLES

Analyte	Date/Time Prepared By		Date/Time Analyzed By		Dilution	QC Sample	Qualifier
Volatile Solids	20JAN09	1425 285	21JAN09	1612 285		W27797-2	
Total Solids	20JAN09	1425 285	21JAN09	1612 285		W27797-2	

LABORATORY CONTROL SAMPLES

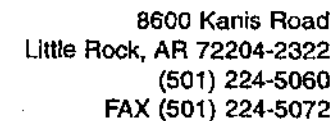
Analyte	Date/Time Prepared By		Date/Time Analyzed By		Dilution	QC Sample	Qualifier
pH	20JAN09	0938 258	20JAN09	1040 258		W27792-1	
pH	20JAN09	0938 258	20JAN09	1040 258		W27792-2	
Ammonia as N	22JAN09	1303 93	22JAN09	1642 93		W27819-2	
Ammonia as N	22JAN09	1303 93	22JAN09	1643 93		W27819-3	
Total Kjeldahl Nitrogen	22JAN09	1336 93	26JAN09	1157 93		W27822-2	
Total Kjeldahl Nitrogen	22JAN09	1336 93	26JAN09	1158 93		W27822-3	
Metals	21JAN09	1145 282	21JAN09	1947 270		S24747-2	
Metals	21JAN09	1145 282	21JAN09	1950 270		S24747-3	
Mercury	21JAN09	0814 282	21JAN09	0901 282		S24742-2	
Mercury	21JAN09	0814 282	21JAN09	0904 282		S24742-3	
Nitrate + Nitrite as N	20JAN09	1407 282	20JAN09	1826 257		S24741-2	
Nitrate + Nitrite as N	20JAN09	1407 282	20JAN09	1826 257		S24741-3	
Oil and Grease	-		20JAN09	1400 07		C12752-2	
Oil and Grease	-		20JAN09	1400 07		C12752-3	

MATRIX SPIKE SAMPLES

Analyte	Date/Time Prepared By		Date/Time Analyzed By		Dilution	QC Sample	Qualifier
Metals	21JAN09	1145 282	21JAN09	1953 270		S24747-4	
Metals	21JAN09	1145 282	21JAN09	1956 270		S24747-5	
Mercury	21JAN09	0814 282	21JAN09	0908 282		S24742-4	
Mercury	21JAN09	0814 282	21JAN09	0911 282		S24742-5	
Nitrate + Nitrite as N	20JAN09	1407 282	20JAN09	1847 257		S24741-4	
Nitrate + Nitrite as N	20JAN09	1407 282	20JAN09	1908 257		S24741-5	

LABORATORY BLANKS

Analyte	Date/Time Prepared By		Date/Time Analyzed By		Dilution	QC Sample	Qualifier
Volatile Solids	20JAN09	1425 285	21JAN09	1612 285		W27797-1	
Total Solids	20JAN09	1425 285	21JAN09	1612 285		W27797-1	
Ammonia as N	22JAN09	1303 93	22JAN09	1640 93		W27819-1	
Total Kjeldahl Nitrogen	22JAN09	1336 93	26JAN09	1155 93		W27822-1	
Metals	21JAN09	1145 282	21JAN09	1943 270		S24747-1	
Mercury	21JAN09	0814 282	21JAN09	0857 282		S24742-1	
Nitrate + Nitrite as N	20JAN09	1407 282	20JAN09	1806 257		S24741-1	
Oil and Grease	-		20JAN09	1400 07		C12752-1	



PAGE OF

5/01

FORM 0060

PERMIT

Number 08170
Expires June 30, 2009

TO SELL COMMERCIAL FERTILIZERS IN MISSOURI

The below named firm is permitted to sell commercial fertilizers under the provisions of the Missouri Fertilizer Law. Sections
266.291 TO 266.351, for the period specified above, unless otherwise revoked in writing.

Approved at Columbia, Missouri, this first day of July 2008

TERRA RENEWAL SERVICES, INC-ST. JOE
TRIUMPH FOOD
PO BOX 3036
RUSSELLVILLE, AR 72811



Director, Missouri Agricultural
Experiment Station

CCI / SPEER

MATERIAL SAFETY DATA SHEET

**SECTION 1. MANUFACTURER INFORMATION**

MANUFACTURED BY: CCI/SPEER

ADDRESS: 2299 Snake River Avenue
Lewiston, Idaho 83501

TELEPHONE #: (208) 746-2351 (24 HOURS)

EMERGENCY CONTACT: Chief Chemist or Assistant Safety Manager

**TRANSPORTATION
EMERGENCY CONTACT:** CHEMTREC 1-800-424-9300

MSDS DATE: 11/19/85 **REVIEW DATE:** 10/06/04 **REVISION DATE:** 12/08/01

SECTION 2. PRODUCT INFORMATION**PRODUCT NAME: Powerloads**

SYNONYMS: Industrial Loads Stud Drivers Industrial Cartridges
Cash Knockers Cow Punchers Noise Blanks

FORMULA NA **C.A.S.#** NA

DOT PROPER SHIPPING NAME: Cartridges, Power Device

UNITED NATIONS (UN) DESIGNATION: 0323 **HAZARD CLASSIFICATION:** 1.4S (ORM-D Domestic)

NFPA: **HEALTH:** **1** **FLAMMABILITY:** **3** **REACTIVITY:** **0** **SPECIAL:** EXPLOSIVE

HAZARDOUS INGREDIENTS **PERCENT** **CAS NUMBER** **UEL/LEL** **EXPOSURE LIMITS**

Copper *	0-50 %	7440-50-8	NE	1 MG/M ³
Zinc *	0-26 %	7440-68-6	NE	5 MG/M ³ (Resp. Dust)
Nitrocellulose	7-17 %	9004-20-0	NE	NA
Nitroglycerin *	5-11 %	5563-0	NE	0.2 PPM Ceiling

NA = NOT AVAILABLE NE = NOT ESTABLISHED MG/M³ = MILLIGRAMS PER CUBIC METER OF AIR
PPM = PARTS PER MILLION REFERENCE OSHA 29 CFR 1910.1000 TABLE Z-1

(*) INDICATES TOXIC CHEMICAL(S) SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF THE SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT (SARA) OF 1986 AND 40 CFR 372.

(*) CERTAIN COMPONENTS LISTED IN THE INGREDIENTS SECTION INCLUDE CASE MATERIAL, PROJECTILE OR OTHER INERT COMPONENTS AND ARE NOT EXPECTED TO BE AN EXPOSURE HAZARD UNDER NORMAL HANDLING CONDITIONS.

5/26/05
Attn: Steve
4 pgs.

CCI/SPEER
MATERIAL SAFETY DATA SHEET

Powerloads

MSDS DATE: 11/19/85 REVIEW DATE: 10/06/04 REVISION DATE: 12/08/01

Page 2



SECTION 3. PHYSICAL HAZARDS

COMBUSTIBLE LIQUID	NO	SKIN HAZARD	YES
FLAMMABLE	NO	EYE HAZARD	YES
PYROPHORIC	NO	TOXIC AGENT	NO
EXPLOSIVE	YES	SENSITIZER	NO
UNSTABLE	NO	CARCINOGEN	NO
WATER REACTIVE	NO	REPRODUCTIVE TOXIN	NO
OXIDIZER	YES	BLOOD TOXIN	NO
ORGANIC PEROXIDE	NO	NERVOUS SYSTEM TOXIN	NO
CORROSIVE	NO	LUNG TOXIN	NO
COMPRESSED GAS	NO	LIVER TOXIN	NO
IRRITANT	YES	KIDNEY TOXIN	NO

POTENTIAL HEALTH EFFECTS

INHALATION: After powerloads have been fired, dust, vapors, and/or fumes may be irritating to the respiratory system and can result in both acute and chronic overexposure. *

INGESTION: When powerloads are fired or otherwise discharged, dust, vapors, and/or fumes may be absorbed by the digestive system and can result in both acute and chronic overexposure. * Ingestion of a complete round can cause irritation to the digestive system, and possibly other unknown health effects.

SKIN CONTACT: After powerloads have been fired, dust, vapors, and/or fumes may cause irritation.

SKIN ABSORPTION: Not likely to occur.

EYE CONTACT: After powerloads have been fired, dust, vapors, and/or fumes may cause irritation. *

ACCIDENTAL INJURY FROM FIRED CARTRIDGE: Fired powerloads can create serious injury. To avoid serious injury, use ammunition only in good condition and originally chambered for a particular caliber. Always keep the barrel free of any obstruction. If the tool fails to fire, a delayed firing may occur, or the tool may fire upon being opened. Wait 30 seconds. Avoid exposure to breach. Carefully unload.

All hazards marked with an asterisk (*) are not expected to be present unless the product is fired, or otherwise discharged so that gasses, fumes, or projectiles are created. Normal handling and shipping should not cause exposure to these hazards. Lead and its inorganic compounds are neurotoxins that may produce neuropathy. For an overview of the health effects of lead exposure, consult the Occupational Safety and Health Administration (OSHA) Appendix A of Occupational Exposure to Lead, 29 CFR 1910.1025.

EFFECTS OF OVEREXPOSURE *

ACUTE OVEREXPOSURE: Adverse health effects are not likely to occur

CHRONIC OVEREXPOSURE: Adverse health effects are not likely to occur

SECTION 4. FIRST AID MEASURES

EYES: If chemicals are gotten in the eyes, flush with copious quantities of water for at least 15 minutes. Get medical attention.

SKIN: Wash thoroughly with soap and water. If physical injury has occurred because of powerloads, get immediate medical attention.

INHALATION: Remove from exposure. Get medical attention if experiencing effects of overexposure. *

CC/SPEER
MATERIAL SAFETY DATA SHEET

Powerloads

MSDS DATE: 11/19/85 REVIEW DATE: 10/06/04 REVISION DATE: 12/08/01

Page 3

**SECTION 5. EMERGENCY RESPONSE INFORMATION**

IF PRODUCT IS INVOLVED IN FIRE: Use water. Fog type application to surrounding areas and other combustibles will reduce the potential for fire spread and will lower temperatures of the product.

FIREFIGHTERS: Must be protected from explosion of material. Normal fire fighting attire will provide limited protection at certain distances if product is packaged. Product may explode if heated above 200 degrees C.

TRANSPORTATION EMERGENCIES: Contact CHEMTREC at 1-800-424-9300. Consult the DOT Emergency Response Guidebook for instructions for handling emergencies involving this product.

SECTION 6. ACCIDENTAL SPILL/RELEASE MEASURES

Dry sweeping can contain spilled product. The recommended means for disposing of scrap is by incineration. Incineration must be at a fully permitted facility specifically designed and permitted in accordance with all applicable local, state, and federal regulations.

After scrapped by proper incineration, the remaining scrap materials should be disposed of or recycled in accordance with local, state, and federal regulations.

SECTION 7. HANDLING AND STORAGE PRECAUTIONS

Store in a cool dry place. Do not crush or drop packages. Avoid heat, electrical current, and acids. CCI-SPEER products are packaged and shipped in accordance with applicable Department of Transportation (DOT) rules. To ensure the highest level of safety while storing these products, keep product in the original packaging until ready to use. Keep away from fire.

SECTION 8. EXPOSURE CONTROL MEASURES

VENTILATION: Mechanical ventilation must be provided if necessary to keep the exposure levels below the exposure limits.

RESPIRATORS: If airborne concentrations exceed the Permissible Exposure Limit (PEL), wear respiratory protection in accordance with the OSHA Standard for Respiratory Protection, 29 CFR 1910.134.

HEARING PROTECTION: If noise levels exceed OSHA limits, while firing this product, use hearing protection in accordance with OSHA's Hearing Conservation Standard, 29 CFR 1910.95.

EYE PROTECTION: Wear ANSI-approved goggles or safety glasses.

HAND PROTECTION: NA

SKIN PROTECTION: If good personal hygiene practices are observed after firing this product, skin exposure problems are not anticipated.

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

APPEARANCE:	Not Applicable	DECOMPOSITION TEMPERATURE	Not Applicable
FREEZING POINT:	Not Applicable	SOLUBILITY IN WATER	Not Applicable
BOILING POINT:	Not Applicable	EVAPORATION RATE	Not Applicable
SPECIFIC GRAVITY:	Not Applicable	MOLECULAR WEIGHT	Not Applicable
BULK DENSITY:	Not Applicable	VOLATILES, PERCENT BY VOLUME	Not Applicable
VAPOR PRESSURE:	Not Applicable	ODOR	Not Applicable
VAPOR DENSITY:	Not Applicable		

CC/SPEER
MATERIAL SAFETY DATA SHEET
Powerloads
MSDS DATE: 11/19/85 REVIEW DATE: 10/06/04 REVISION DATE: 12/08/01
Page 4



SECTION 10. STABILITY AND REACTIVITY

This product is normally stable. However, because of the design of ammunition and its components, partial detonation upon impact or intense heat may occur. Mass detonation will not occur. Keep away from fire.

SECTION 11. HANDLING AND DISPOSAL OF SCRAP

The recommended means for disposing of scrap is by incineration at a fully permitted facility specifically designed and permitted in accordance with all applicable local, state, and federal regulations.

After scrapped by proper incineration, the remaining scrap materials should be disposed of or recycled in accordance with local, state, and federal regulations.

SECTION 12. OTHER INFORMATION

The information in this MSDS was obtained from sources, which we believe are reliable. However, the information is provided without any representation or warranty, expressed or implied, regarding the accuracy or correctness.

The conditions or methods of handling, storage, use and disposal of this product are beyond our control and may be beyond our knowledge. For these and other reasons, we do not assume responsibility and expressly disclaim liability for loss, damage, or expense arising out of or in any way connected with the handling, storage, use, or disposal of this product.



U.S. Department
of Transportation

Research and
Special Programs
Administration

The U.S. Department of Transportation
Competent Authority for the United States

400 Seventh Street, S.W.
Washington, D.C. 20003

CLASSIFICATION OF EXPLOSIVES

Based upon a request by Federal Cartridge Co. (formerly Blount, Inc.), P.O. Box 856, Lewiston, ID, the following items are classed in accordance with Section 173.56, Title 49, Code of Federal Regulations, (49 CFR). A copy of your application, all supporting documentation and a copy of this approval must be retained and made available to DOT upon request.

U.N. PROPER SHIPPING NAME AND NUMBER

Cartridges, power device, UN0323

U.N. CLASSIFICATION CODE: 1.4S

REFERENCE NUMBER

EX1989060237

EX1989060239

EX1989060238

EX1989060240

EX1989060241

EX1989060242

PRODUCT DESIGNATION/PART NUMBER

22 Caliber long powerloads (all levels)

22 Caliber short powerloads (all levels)

25 Caliber long powerloads (all levels)

25 Caliber short powerloads (all levels)

27 Caliber long powerloads (all levels)

27 Caliber short powerloads (all levels)

DATED: April 16, 2002

Approved by:

Robert A. McGuire
Associate Administrator for
Hazardous Materials Safety

Tracking No: 2002040115

Page 1 of 1

BILL OF LADING/MANIFEST

1. Shipper's US EPA ID No. (If Applicable)

Document No.

2. Page 1
of 1

MOR000522748

3. Shipper's Name and Mailing Address
TRIUMPH FOODS
5302 STOCKYARDS EXPRESSWAY

SAINT JOSEPH

MO 64504

4. Shipper's Phone (816 896-2825

5. Transporter 1 Company Name

6. US EPA ID Number

A. Transporter's Phone

SAFETY KLEEN SYSTEMS, INC

MOD980973564

816 796-9660

7. Transporter 2 Company Name

8. US EPA ID Number

B. Transporter's Phone

SAFETY-KLEEN SYSTEMS, INC

TXR000050930

800 669-5840

9. Designated Facility Name and Site Address 050597

10. US EPA ID Number

C. Facility's Phone

CLEANLITES RECYCLING INC.
665 HULL RD
MASON MI 48854

MIR000016402

517 676-0044

11. Shipping Name and Description

12. Containers

13. Total Quantity

14. Unit Wt/Vol

HM

No.

Type

Quantity

Unit

a. NON REGULATED MATERIAL (UNIVERSAL
WASTE-MERCURY CONTAINING LAMPS)

001

DF

000625

P

b.					
c.					
d.					

15. Special Handling Instruction and Additional Information

MFST R/T#108567857 0003-0352-40
EMERGENCY RESP 800-468-1760(24 HR). IF UNDELIVERABLE RETURN TO GENERATOR.
SK CORP AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY.

SKDOT# A: 11518 B: C: D:

16a. US DOT HAZARDOUS MATERIALS SHIPPER'S CERTIFICATION:

*This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Printed/Typed Name

Signature required
here if
US DOT regulated

Month Day Year

16b. NON-REGULATED SHIPPER'S CERTIFICATION: I certify the materials described above on this form are not subject to federal regulations for Transportation or Disposal.

Printed/Typed Name

Sign here if
material is not
DOT regulated

Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

ATTACHMENT 13 Page 1 of 2

20. Facility Owner or Operator: Certification of receipt of materials covered by this form except as noted in Item 19.

Printed/Typed Name

Signature

Month Day Year

IN EVENT OF EMERGENCY CALL
1-800-468-1760 (24 hours)

ATTACHMENT 13 Page 1 of 2 ORIGINAL-RETURN TO GENERATOR

FORM NO. 90291 (11/96)

OF LADING/MANIFEST

1. Shipper's US EPA ID No. (If Applicable)

Document No.

2. Page 1

MOR000522748

1.0052 of 1

Shipper's Name and Mailing Address

TRIUMPH FOODS
5302 STOCKYARDS EXPRESSWAY

SAINT JOSEPH

MO 64504

524098E
COPY

4. Shipper's Phone (816 896-2825

5. Transporter 1 Company Name

6.

US EPA ID Number

A. Transporter's Phone

~~SAFETY-KLEEN SYSTEMS, INC~~~~MOD980973564~~

816 796-9660

7. Transporter 2 Company Name

8.

US EPA ID Number

B. Transporter's Phone

SAFETY-KLEEN SYSTEMS, INC

TXR000050930

800 669-5840

9. Designated Facility Name and Site Address

050597

10.

US EPA ID Number

C. Facility's Phone

CLEANLITES RECYCLING INC.
665 HULL RD
MASON MI 48854

MIR000016402

517 676-0044

MO 694 499

11. Shipping Name and Description

12. Containers

13. Total

14. Unit

HM

No.

Type

Quantity

Wt/Vol

a. NON REGULATED MATERIAL (UNIVERSAL
WASTE-MERCURY CONTAINING LAMPS)

b.

c.

d.

15. Special Handling Instruction and Additional Information

MFST R/T#108523611 0003-0352-40
EMERGENCY RESP 800-468-1760(24 HR). IF UNDELIVERABLE RETURN TO GENERATOR.
SK CORP AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY.

SKDOT# A: 11518 B:

C:

D:

16a. US DOT HAZARDOUS MATERIALS SHIPPER'S CERTIFICATION:

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Signature required
here if
US DOT regulated

Month Day Year

16b. NON-REGULATED SHIPPER'S CERTIFICATION: I certify the materials described above on this form are not subject to federal regulations for Transportation or Disposal.

Printed/Typed Name

Sign here if
material is not
DOT regulated

Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

ATTACHMENT 13 Page 2 of 2

20. Facility Owner or Operator: Certification of receipt of materials covered by this form except as noted in Item 19.

Printed/Typed Name

Signature

Month Day Year

MIKE KIMMEL

10/10/07

IN EVENT OF EMERGENCY CALL
1-800-468-1760 (24 hours)

ATTACHMENT 13 Page 2 of 2 ORIGINAL-RETURN TO GENERATOR

FORM NO. 90291 (11/96)

BILL OF LADING/MANIFEST

1. Shipper's US EPA ID No. (If Applicable)

MOR000522748

Document No.

05943

2. Page 1

of 1

3. Shipper's Name and Mailing Address

TRIUMPH FOODS
5302 STOCKYARDS EXPRESSWAY

SAINT JOSEPH

MO 64504

4. Shipper's Phone (816 396-2825

5. Transporter 1 Company Name

SAFETY-KLEEN SYSTEMS, INC

6.

US EPA ID Number

MOD980973564

A. Transporter's Phone

816 796-9660

7. Transporter 2 Company Name

SAFETY-KLEEN SYSTEMS, INC

8.

US EPA ID Number

TXR000050930

B. Transporter's Phone

800 669-5840

9. Designated Facility Name and Site Address

000654

10.

US EPA ID Number

SAFETY-KLEEN SYSTEMS, INC.
633 E 138TH ST
DOLTON, IL 60419

ILD980613913

C. Facility's Phone

708 225-8100

11. Shipping Name and Description

HM

12. Containers

No.

Type

13. Total
Quantity14. Unit
Wt/Vola. NON REGULATED MATERIAL (UNIVERSAL
WASTE-MERCURY CONTAINING LAMPS)

005

CF

00175

P

b. UNIVERSAL WASTE LAMPS
NOT USDOT REGULATED
(HALOGEN LAMPS)

001

DF

00050

P

15. Special Handling Instruction and Additional Information

MFST R/T#109293357 0003-0352-40

EMERGENCY RESP 800-468-1760(24 HR).

SK CORP AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY.

SKDOT# A: 11518 B: 12830 C:

D:

16a. US DOT HAZARDOUS MATERIALS SHIPPER'S CERTIFICATION:

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Printed/Typed Name

Signature required
here if
US DOT regulated

Month

Day

Year

16b. NON-REGULATED SHIPPER'S CERTIFICATION: I certify the materials described above on this form are not subject to federal regulations for Transportation or Disposal.

Printed/Typed Name

Sign here if
material is not
DOT regulated

Month

Day

Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month

Day

Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month

Day

Year

19. Discrepancy Indication Space

ATTACHMENT 14 Page 1 of 1

20. Facility Owner or Operator: Certification of receipt of materials covered by this form except as noted in Item 19.

Printed/Typed Name

Signature

Month

Day

Year

IN EVENT OF EMERGENCY CALL

1-800-468-1760 (24 hours)

ORIGINAL RETURN TO GENERATOR

FORM NO. 90291 (11/96)

ATTACHMENT 14 Page 1 of 1



326049
D248848

TECHNICAL SOLUTIONS
NORTH AMERICA

Customer:
RECYCLE PAK
5736 WEST JEFFERSON STREET
PHOENIX, AZ 85043

Generator:
TRIUMPH FOODS LLC
5307 STOCKYARDS EXPRESSWAY
ST JOSEPH, MO 64504

Veolia ES Technical Solutions L.L.C. AZ0000337360
Certificate of Recycling and/or Disposal
Manifest/BOL Number: PAK00189492

Type	Quantity	Unit of Measure	Serial Number
Recycle - Alkaline Batteries	50	P	081988500189492

By accepting the waste products described on the shipping paper referenced above, Veolia ES Technical Solutions, L.L.C. certifies to the generator that the transportation, storage, and processing methods employed are in accordance with Veolia ES permit parameters, the Toxic Substance Control Act, the Resource Conservation and Recovery Act, the Hazardous Materials Transportation Act, the Occupational Health and Safety Act and all applicable federal, state and local laws.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Heath Hildebrand
General Manager

Date Received: 2/2/2007



Certificate of Recycling and/or Disposal

This certificate certifies that the waste described below has been properly recycled and/or disposed in accordance with state, federal and local regulations. The document number shown below should be used when inquiring about any issues with the proper handling, recycling and/or disposal of the waste.

CUSTOMER:

TRIUMP FOODS
5302 STOCKYARDS EXPRESS WAY

SAINT JOSEPH, MO 64505

GENERATOR:

TRIUMP FOODS
5302 STOCKYARDS EXPRESS WAY

SAINT JOSEPH, MO 64505

WASTE RECYCLED AND/OR DISPOSED:

	<u>Quantity</u>	<u>Unit of Measure</u>
Recycle - Alkaline Batteries	147.0	P



RECYCLEPAK

FACILITY:**RECEIVED DATE:****SO#****DOCUMENT#:****SHIPPING PAPER:**

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C. PORT WASHINGTON, WI 53074 WID988566543

4/2/2008

375635

D334374

PAK00910142



KEVIN D. SHAVER

OPERATIONS MANAGER



Certificate of Recycling and/or Disposal

This certificate certifies that the waste described below has been properly recycled and/or disposed in accordance with state, federal and local regulations. The document number shown below should be used when inquiring about any issues with the proper handling, recycling and/or disposal of the waste.

CUSTOMER:

TRIUMPH FOODS LLC
5307 STOCKYARDS EXPRESSWAY

ST JOSEPH, MO 64504

GENERATOR:

TRIUMPH FOODS LLC
5307 STOCKYARDS EXPRESSWAY

ST JOSEPH, MO 64504

WASTE RECYCLED AND/OR DISPOSED:

Recycle - Mixed Batteries

Quantity

89.0

Unit of Measure

P

RECYCLEPAK

FACILITY:

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C. PORT WASHINGTON, WI 53074 WID988566543

RECEIVED DATE:

7/23/2008

SO#

390053

DOCUMENT#:

D364130

SHIPPING PAPER:

PAK10368125



KEVIN D. SHAVER

OPERATIONS MANAGER



RECEIVED
AUG 04 2008

BY:

Certificate of Recycling and/or Disposal

This certificate certifies that the waste described below has been properly recycled and/or disposed in accordance with state, federal and local regulations. The document number shown below should be used when inquiring about any issues with the proper handling, recycling and/or disposal of the waste.

CUSTOMER:

TRIUMP FOODS
5302 STOCKYARDS EXPRESS WAY

SAINT JOSEPH, MO 64505

GENERATOR:

TRIUMP FOODS
5302 STOCKYARDS EXPRESS WAY

SAINT JOSEPH, MO 64505

WASTE RECYCLED AND/OR DISPOSED:

	<u>Quantity</u>	<u>Unit of Measure</u>
Recycle - Mixed Batteries	114.0	P

Recycled Batteries

RECYCLEPAK

FACILITY:

RECEIVED DATE:

SO#

DOCUMENT#:

SHIPPING PAPER:

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C. PORT WASHINGTON, WI 53074 WID988566543

7/29/2008

391177

D365063

PAK10368187



KEVIN D. SHAVER

OPERATIONS MANAGER



Certificate of Recycling and/or Disposal

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CUSTOMER:

TRIUMP FOODS
5302 STOCKYARDS EXPRESS WAY

SAINT JOSEPH, MO 64505

GENERATOR:

TRIUMP FOODS
5302 STOCKYARDS EXPRESS WAY

SAINT JOSEPH, MO 64505

WASTE RECYCLED AND/OR DISPOSED:

	<u>Quantity</u>	<u>Unit of Measure</u>
Recycle - Mixed Batteries	106.0	P

RECYCLEPAK

FACILITY:

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C. PORT WASHINGTON, WI 53074 WID988566543

RECEIVED DATE:

1/28/2009

SO#

417517

DOCUMENT#:

D414596

SHIPPING PAPER:

PAK11418911



KEVIN D. SHAVER

OPERATIONS MANAGER

P.I.T. Batteries

Energys (Load Hog)

Dave Chester

816-231-1414

M.E.T. (DEKA, Crown)

Kevin Meyer

816-228-8883

Magnum Industrial Power (Ricco)

Jeff Terrill

816-296-3636

As needed basis

**MATERIAL SAFETY DATA SHEET
PRO-GREEN EVAPORATIVE COIL CLEANER**

CATALOG NO. 8-G

SECTION I-IDENTIFICATION

MANUFACTURED BY: Diversitech, Inc
ADDRESS: 6650 Sugarloaf Parkway, Suite 100
Duluth, GA 30097

EMERGENCY Phone No. 800-255-3924 Chem-Tel (Chemical Emergencies Only)

PHONE NUMBER FOR INFORMATION: 800-995-2222

DATE REVISED: 4/29/2008

NAME OF PREPARER: ANTHONY E. JERNIGAN

HAZARD RATINGS HMIS DATA		
HEALTH	0	0=MINIMAL
FLAM	0	1=SLIGHT
REACTIVITY	0	2=MODERATE
		3=HIGH
		4=EXTREME

SECTION II HAZARDOUS INGREDIENTS INFORMATION

INGREDIENT	CAS NO PEL	OSHA TLV	ACIGH STEL	OTHER RNG	% or
2-Butoxyethanol	111-76-2	25 ppm	25 ppm	50 ppm	<3

SECTION III - PHYSICAL/CHEMICAL CHARACTERISTICS

Boiling Point: 214°F	Specific gravity (H ₂ O = 1): 1.02
Vapor pressure (mm Hg): Same as water	Melting Point (Pour Point): <32°F
Vapor Density (Air = 1): 2.245	Evaporation Rate (Water = 1): 1
Solubility in water: Water miscible	
Appearance and odor: Clear green liquid; mild glycol ether odor.	

SECTION IV- FIRE AND EXPLOSION HAZARD DATA

Flash Point (Method Used): None

Flammable Limits: None

Extinguishing media: Not applicable

Special Fire Fighting Procedures: Keep containers cooled with a water spray if involved in a fire.

Unusual Fire and Explosion Hazards: None

SECTION V - REACTIVITY DATA

Stability-Stable

Conditions to avoid: None

Incompatibility (Materials to avoid): Strong oxidizers, strong acids

Hazardous Decomposition or Byproducts: May evolve carbon monoxide, carbon dioxide, and other unidentified fragments if this product is involved in a fire.

Hazardous Polymerization: Will not occur.

PRO-GREEN EVAPORATIVE COIL CLEANER, 8-G - MSDS

SECTION VI- HEALTH HAZARD DATA

Routes of Entry: Inhalation: yes (mists) Skin: yes Ingestion: yes Eyes: yes

Health Hazards (acute and chronic): The toxicological properties of this compound have not been fully tested. Analogous compounds are essentially non-toxic.

Carcinogenicity: NTP? No IARC Monographs? No OSHA Regulated? No

Signs and symptoms of exposure:

Inhalation: If sprayed or misted may cause chemical pneumonia. This product is not toxic by inhalation.

Skin: Minimally irritating. Prolonged contact may cause dermatitis or drying of skin.

Ingestion: **Do not take internally.** Low toxicity on ingestion. May cause nausea or diarrhea.

Eyes: May cause eye irritation.

Medical Conditions Aggravated by Exposure: Contact or breathing mists may exacerbate existing skin or respiratory disorders.

Emergency and First Aid Procedures:

Eyes: Flush with water for 15 minutes. Consult a physician if irritation persists

Skin: Remove contaminated clothing. Wash the affected area with soap and water.

Laundry or dry clean clothes before reuse. Discard contaminated leather articles.

Inhalation: Evacuate to a safe area with plenty of fresh air. Allow the affected individual to rest in a well ventilated area, then seek medical aid immediately.

Ingestion: **DO NOT** induce vomiting. Administer 3-4 glasses of water or milk, and call the nearest poison control center

SECTION VII - PRECAUTIONS FOR SAFE HANDLING AND STORAGE

STEPS TO BE TAKEN IF MATERIAL IS SPILLED OR RELEASED:

Wear recommended protective clothing. Remove contaminated garments promptly.

Remove unnecessary personnel from the area. Floors may be slippery; use care to avoid falling. Dike the spill immediately with appropriate materials to prevent the spread of liquid. Absorb the liquid with an inert absorbent such as sand, dirt, vermiculite or "oil-dri", or use commercial absorbent pads. Transfer liquids and solid diking material to suitable containers, and dispose of in accordance with local, state, and federal regulations.

DO NOT contaminate municipal sewers or other open bodies of water with runoff.

WASTE DISPOSAL METHODS: Incinerate this material and all associated wastes, or bury in an approved landfill in accordance with governmental regulations.

PRO-GREEN EVAPORATIVE COIL CLEANER, 8-G - MSDS

HANDLING AND STORAGE:

Avoid contact with skin and eyes. Keep containers closed when not in use. Store in a dry, cool, well-ventilated area.

Empty containers may retain residue. All containers should be disposed of in an environmentally safe manner, and in accordance with all governmental regulations. Keep this and all chemicals out of the reach of children.

SECTION VIII – CONTROL MEASURES

Respiratory Protection (Specify Type): Use in a well-ventilated area. If mist is being generated and exceeds the TLV, a respiratory program meeting OSHA 1910.134 and ANSI Z88.2 requirements must be followed.

Ventilation: Local exhaust is recommended when used in enclosed areas.

Protective Gloves: Neoprene or other materials may be used if there is documented evidence of compatibility.

Eye protection: Safety glasses (ANSI Z87.1) or approved equivalent as necessary to minimize eye contact hazards.

Other Protective Clothing: Neoprene aprons, overshoes, oversleeves or other impervious clothing as necessary to minimize exposure.

Work Hygienic Practices: Use proper industrial hygiene practices to minimize hazardous exposure. Wash hands after handling this material, and before eating or smoking.

SECTION IX – ADDITIONAL INFORMATION

Transportation Information:

DOT HAZARD LABEL: None

NMFA Description: Cleaning Compound, Liquid, NOS (Non-hazardous)

TSCA: All ingredients are TSCA approved.

SARA TITLE III Reporting Requirements:

Section 302: EHS reporting not required

Section 304: Hazardous releases reporting not required

Section 311: Community Right To Know reporting is required if the inventory is above the Threshold

Planning Quantity.

Section 312: R-T-K Inventory data reporting is not required.

Section 313: Emissions and release reporting may be required for users of this product within the manufacturing sector. This does not apply to service companies.

This information is, to the best of our knowledge and belief, accurate and reliable as of the date completed. However no representation, warranty or guarantee is made as to its accuracy, reliability or completeness. It is the user's responsibility to satisfy himself as to the completeness and suitability of such information for his own particular use. We do not accept liability for any loss or damage that may occur from the use of this information, nor do we offer any warranty against patent infringement.

Request for Information
Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA) hh 5/26/2009

TO: Facility Name: Triumph Foods
Address: 5302 Stockyards Express
St. Joseph, MO 64504
EPA ID Number: MO000522748 Date: 5/26/2009

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the the inspection.

Citation

Description of Violation

Could you provide a copy of the
following:

- (A) Analysis of the black cartridge
- (B) Wastewater Sludge analysis
- (C) Citrus based cleaner Material safety data sheet (MSDS)
- (D) Truck Wash Soap MSDS

You are requested to submit a written response within **14 calendar days** of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII

ATTN. _____

If you have any questions about this Notice or wish to discuss your response, you may call me at _____, or _____ (Compliance Officer) at _____.

This Notice prepared by Michael S. Martin Date: 5/26/2009

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: B. PATT LILLY Date: 5/26/09
Signature: [Signature]
Title: CEO

MATERIAL SAFETY DATA SHEET



603 N Monitor Road
Springdale, AR 72764
PH: (479) 756-5874

PRODUCT NAME: CARBOCHLOR

MSDS NO: 52050.06

PAGE 1 OF 2

FOR CHEMICAL EMERGENCY, SPILL, LEAK, FIRE, EXPOSURE CALL: CHEMTREC 1-800-424-9300 OUTSIDE US CALL 1-703-527-3887	FOR MEDICAL EMERGENCY CALL ROCKY MOUNTAIN POISON CENTER: 1-303-623-5716	HEALTH HAZARD: (0 None > 4 Extreme) Health =2 Flammability =0 Reactivity =0
---	---	--

SECTION 1 – PRODUCT IDENTIFICATION

DATE PREPARED: November 6, 2008

SUPERSEDES: April 21, 2006

PREPARED BY: Michael E. Elmore

D.O.T. SHIPPING CLASS: Refer to bill of lading or container label for DOT or other transportation hazard classification; ship in accordance with 49 CFR parts 100-185.

SECTION 2 – HAZARDOUS INGREDIENTS

HAZARDOUS COMPONENTS	CAS. NO.	OSHA PEL	ACGIH TLV	ORAL LD50 RAT	Per-Cent
Ethoxylated Alcohol	68439-45-2	NE	NE	5100 mg/kg	1-5%
Ethylene Glycol Monobutyl Ether *	111-76-2	25 ppm SKIN	25 ppm SKIN	470 mg/kg	1-5%
Sodium Metasilicate	6834-92-0	NE	NE	800 mg/kg	3-7%

* subject to reporting requirements of Section 313 of Title III of SARA and 40 CFR Part 372

SECTION 3 – PHYSICAL & CHEMICAL CHARACTERISTICS

BOILING POINT: > 212 F

SOLUBILITY IN WATER: Soluble

SPECIFIC GRAVITY: 1.03

VAPOR PRESSURE mm/hg: 23 @ 70 F VAPOR DENSITY (Air=1): 1.2

REACTIVITY IN WATER: None

pH 5% SOLUTION = 10.7

MELTING POINT: 32 F

APPEARANCE AND ODOR: Clear liquid, slight chlorine odor

SECTION 4 – FIRE & EXPLOSION DATA

FLASH POINT: None

FLAMMABILITY LIMITS IN AIR % BY VOLUME:

METHOD USED: None

LEL LOWER: None

UEL UPPER: None

AUTO-IGNITION TEMPERATURE: None

EXTINGUISHER MEDIA: Water, Dry Chemical, Carbon Dioxide, Foam

SPECIAL FIRE FIGHTING PROCEDURES: None

UNUSUAL FIRE & EXPLOSION HAZARDS: None

SECTION 5 – PHYSICAL HAZARDS (REACTIVITY DATA)

STABILITY: Stable

INCOMPATIBILITY (MATERIALS TO AVOID): Acids

HAZARDOUS DECOMPOSITION PRODUCTS: Chlorine Gas

HAZARDOUS POLYMERIZATION: Will NOT occur

CONDITIONS TO AVOID: NA

SECTION 6 – HEALTH HAZARDS**ACUTE:** Eye and skin irritation**CHRONIC:** None Known**SIGNS & SYMPTOMS OF EXPOSURE:** Eye irritation – Skin irritation**MEDICAL CONDITIONS GENERALLY AGGRAVATED BY EXPOSURE:** NA**CARCINOGEN OR POTENTIAL CARCINOGENS:** OSHA: None NTP: None IARC: None ACGIH: None**EMERGENCY FIRST AID:****EYES:** Immediately flush with water for 15 minutes. GET MEDICAL ATTENTION IMMEDIATELY!**SKIN:** Wash thoroughly with water. Get medical attention if irritation persists.**INHALATION:** NA**INGESTION:** Drink water, call a physician immediately.**ROUTES OF ENTRY:****INHALATION:** NA**EYES:** Undiluted can cause eye irritation or burns**SKIN:** Undiluted can cause irritation**INGESTION:** Undiluted can cause stomach irritation**SECTION 7 – SPECIAL PRECAUTIONS & SPILL / LEAK PROCEDURES****HANDLING & STORAGE:** Store in a cool dry area. DO NOT FREEZE. Keep closed when not in use.**OTHER PRECAUTIONS:** Normal good housekeeping practices.**IN CASE OF SPILL:** Shut off leak, if this can be done without injury. Flush area with water. Large spills should be diked with earth; then pump to a salvage tank.**WASTE DISPOSAL:** Dispose of in accordance with all Federal, State and Local pollution control regulations.**SECTION 8 – SPECIAL PROTECTION INFORMATION****RESPIRATORY PROTECTION:** NA**VENTILATION:** Use with adequate ventilation.**PROTECTIVE GLOVES:** Rubber**EYE PROTECTION:** Safety Glasses or Goggles**OTHER:** Waterproof suit and boots may be worn**HYGIENIC PRACTICES:** Wash thoroughly after handling.**SECTION 9 – COMMUNITY RIGHT TO KNOW LIST**

	CHEMICAL NAME:	C.A.S. NO.
1.	Water	7732-18-5
2.	Sodium Tripoly Phosphate	7758-29-4
3.	Sodium Metasilicate	6834-92-0
4.	Ethylene Glycol Monobutyl Ether	111-76-2
5.	Ethoxylated Alcohol	68439-45-2

NA = Not Applicable

NE = None Established

The information provided in this Material Safety Data Sheet has been compiled from our experience and data presented in various technical publications. It is the users responsibility to determine the suitability of this information for the adoption of safety precautions as may be necessary. We reserve the right to revise Material Safety Data Sheets from time to time as new technical information becomes available. The information herein is furnished without warranty of any kind.

PHOTO LOG

Facility Name/City: Triumph Foods, 5302 Stockyards Expressway, St. Joseph, MO 64504

Facility ID #: MOR000522748

Date: May 26, 2009

Photographer: Michael J. Martin

Type of Camera: Canon Power Shot G5, Serial #: 6721003894

Digital Recording Media: Flashcard

All digital photos were copied by: Michael J. Martin on June 15, 2009.

All digital photos were copied to: CD-R

Original copy is stored in: CD-R Digital photos were downloaded to CD-R by Michael J. Martin.

No changes were made in the original image files prior to storage on the CD-R.

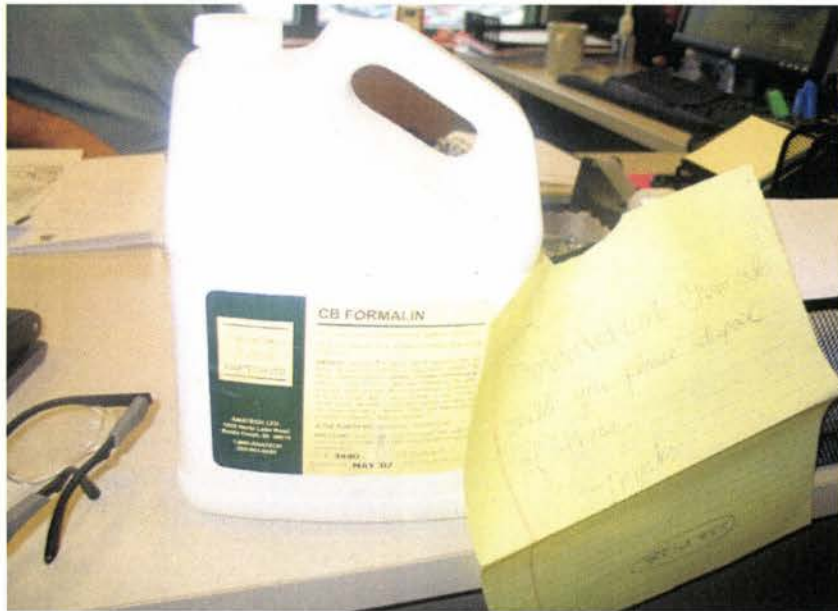
Michael J. Martin

Report Photo#	Photographer	Date	Approx. Time	File Name (IMG_XXX.jpg)	Description
1	Michael J. Martin	5/26/2009	1:27 PM	0001	Photo one ¾ full five gallon container of formalin (labeled with the words "Outdated Chemical") located at the Administrative Building (Safety Office). Photo taken facing south.
2	Michael J. Martin	5/26/2009	1:46 PM	0002	Photo of two .25 caliber rim fire cartridges located at the Staging Area. Photo taken facing north.
3	Michael J. Martin	5/26/2009	1:47 PM	0003	Photo of the stunner located at the Staging Area. Photo taken facing north.
4	Michael J. Martin	5/26/2009	1:48 PM	0004	Photo of the rubber components of the stunner located at the Staging Area. Photo taken facing south.
5	Michael J. Martin	5/26/2009	1:49 PM	0005	Same image as Photo #2. Photo taken facing north.
6	Michael J. Martin	5/26/2009	2:04 PM	0006	Photo of one 500 gallon aboveground used oil tank (labeled with the words "Used Oil") located at the East Rendering Building. Photo taken facing north.
7	Michael J. Martin	5/26/2009	2:12 PM	0007	Photo of one 5 gallon container of spent COD test solution (labeled with the words "Hazardous Waste") located at the Wastewater Pretreatment Lab. Photo taken facing north.
8	Michael J. Martin	5/26/2009	2:12 PM	0008	Photo of one COD test kit located at the Wastewater Pretreatment Lab. Photo taken facing north.

16	Michael J. Martin	5/26/2009	2:48 PM	0016	Photo of one yellow 55 gallon container of universal waste-lamps (spent HID lamps) (closed and labeled as "Used HID Bulbs") located at the Monfort Building. Photo taken facing east.
17	Michael J. Martin	5/26/2009	3:10 PM	0017	Photo of one ½ full red five gallon container of spent alkaline batteries and spent nickel cadmium batteries (not labeled as "Universal Waste-Batteries," "Waste Batteries", or "Used Batteries") located at the Parts Room. Photo taken facing west.
18	Michael J. Martin	5/26/2009	3:11 PM	0018	Photo of two stunner units located at the Parts Room. Photo taken facing north.
19	Michael J. Martin	5/26/2009	3:20 PM	0019	Photo of two ½ full red five gallon container of spent alkaline batteries and spent nickel cadmium batteries (not labeled as "Universal Waste-Batteries," "Waste Batteries", or "Used Batteries") located at the PPE Room. Photo taken facing east.

TRIUMPH FOODS
8302 Stockyards Expressway
St. Joseph, MO 64504
RCRA CEI Photos

Photos taken by Michael J. Martin *Michael J. Martin*
on May 26, 2009



Triumph Foods
St. Joseph, MO 64504
May 26, 2009

Photo one 3/4 full five gallon container of formalin (labeled with the words "Outdated Chemical") located at the Administrative Building (Safety Office). Photo taken facing south.

Photo 1 Michael J. Martin *MJM*



Triumph Foods
St. Joseph, MO 64504
May 26, 2009

Photo of two .25 caliber rim fire cartridges located at the Staging Area. Photo taken facing north.

Photo 2 Michael J. Martin *MJM*



Triumph Foods
St. Joseph, MO 64504
May 26, 2009

Photo of the stunner located at the
Staging Area. Photo taken facing north.

Photo 3

Michael J. Martin *MJM*

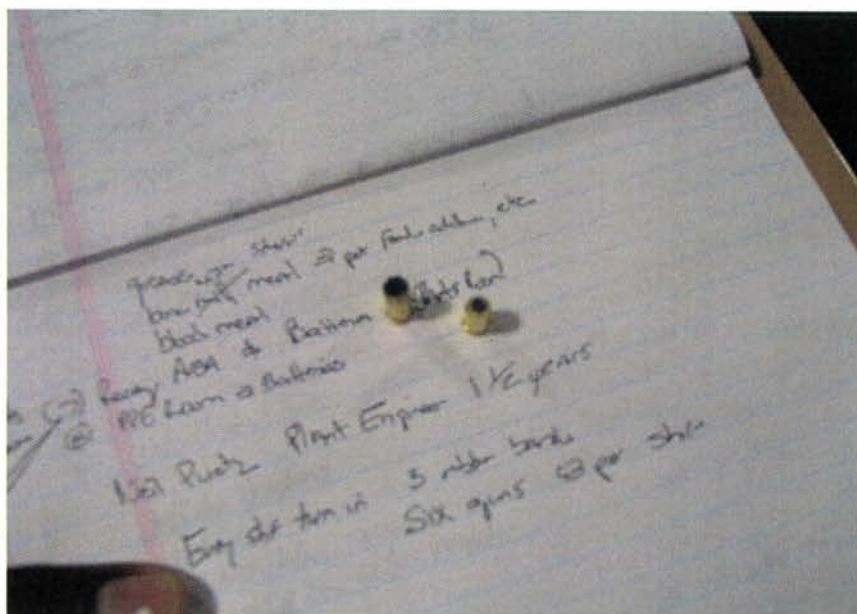


Triumph Foods
St. Joseph, MO 64504
May 26, 2009

Photo of the rubber components of the
stunner located at the Staging Area.
Photo taken facing south.

Photo 4

Michael J. Martin *MJM*



Triumph Foods
St. Joseph, MO 64504
May 26, 2009

Same image as Photo #2. Photo taken facing north.

Photo 5

Michael J. Martin *MJM*



Triumph Foods
St. Joseph, MO 64504
May 26, 2009

Photo of one 500 gallon aboveground used oil tank (labeled with the words "Used Oil") located at the East Rendering Building. Photo taken facing north.

Photo 6

Michael J. Martin *MJM*

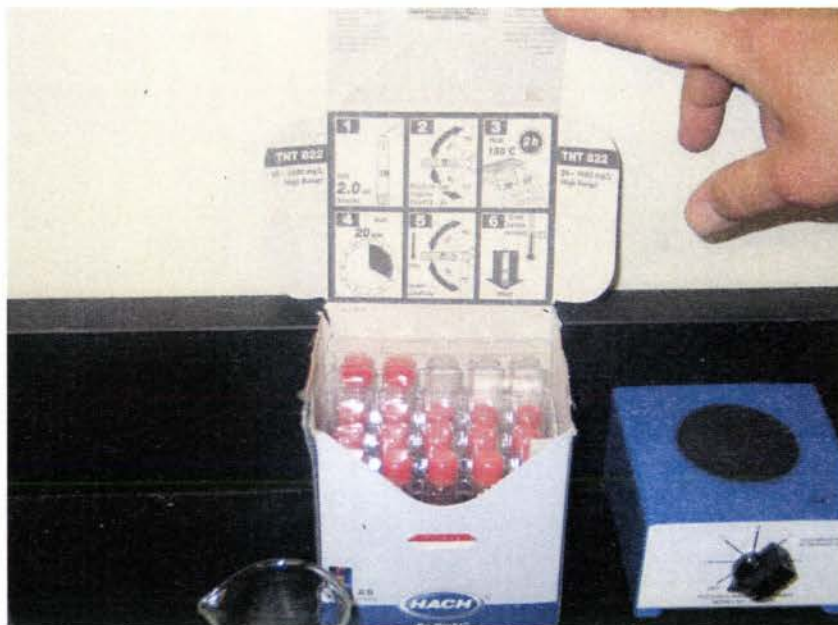


Triumph Foods
St. Joseph, MO 64504
May 26, 2009

Photo of one 5 gallon container of spent COD test solution (labeled with the words "Hazardous Waste") located at the Wastewater Pretreatment Lab. Photo taken facing north.

Photo 7

Michael J. Martin *MJM*



Triumph Foods
St. Joseph, MO 64504
May 26, 2009

Photo of one COD test kit located at the Wastewater Pretreatment Lab. Photo taken facing north.

Photo 8

Michael J. Martin *MJM*



Triumph Foods
St. Joseph, MO 64504
May 26, 2009

Photo of two full 55 gallon used oil storage containers (labeled with the words "Used Oil") located at the Compressor Room. Photo taken facing north.

Photo 9

Michael J. Martin *MJM*



Triumph Foods
St. Joseph, MO 64504
May 26, 2009

Photo of one cardboard container containing at least 20 spent T8 fluorescent lamps (not closed) located at the Monfort Building. Photo taken facing north.

Photo 10

Michael J. Martin *MJM*



Triumph Foods
St. Joseph, MO 64504
May 26, 2009

Photo of one cardboard container containing at least ten 8 ft. spent fluorescent lamps (eight green tip spent fluorescent lamps and two silver tip spent fluorescent lamps) (right) and one cardboard container containing three spent T8 fluorescent lamps (left) (both containers not closed) located at the Monfort Building. Photo taken facing north.

Photo 11

Michael J. Martin *MJM*



Triumph Foods
St. Joseph, MO 64504
May 26, 2009

Photo of one cardboard container containing six spent 100 watt fluorescent lamps (not closed) located at the Monfort Building. Photo taken facing west.

Photo 12

Michael J. Martin *MJM*



Triumph Foods
St. Joseph, MO 64504
May 26, 2009

Photo of one cardboard container containing at least 20 spent T8 fluorescent lamps (not closed and labeled as "Waste Lamps") located at the Monfort Building. Same image a Photo #10. Photo taken facing north.

Photo 13

Michael J. Martin *MJM*



Triumph Foods
St. Joseph, MO 64504
May 26, 2009

Photo of five cardboard containers of universal waste-lamps (spent 8ft. fluorescent lamps) (closed and labeled as "Used Bulbs") located at the Monfort Building. Photo taken facing northeast.

Photo 14

Michael J. Martin *MJM*

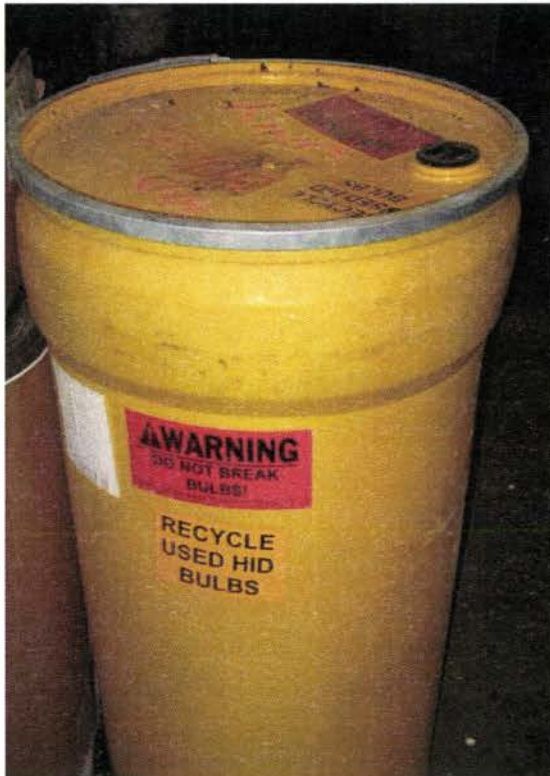


Triumph Foods
St. Joseph, MO 64504
May 26, 2009

Photo of five cardboard containers of universal waste-lamps (spent 8ft. fluorescent lamps) (closed and labeled as "Used Bulbs") located at the Monfort Building. Photo taken facing north.

Photo 15

Michael J. Martin *MJM*



Triumph Foods
St. Joseph, MO 64504
May 26, 2009

Photo of one yellow 55 gallon container of universal waste-lamps (spent HID lamps) (closed and labeled as "Used HID Bulbs") located at the Monfort Building. Photo taken facing east.

Photo 16

Michael J. Martin *MJM*



Triumph Foods
St. Joseph, MO 64504
May 26, 2009

Photo of one ½ full red five gallon container of spent alkaline batteries and spent nickel cadmium batteries (not labeled as “Universal Waste—Batteries,” “Waste Batteries”, or “Used Batteries”) located at the Parts Room. Photo taken facing west.

Photo 17

Michael J. Martin *MJM*



Triumph Foods
St. Joseph, MO 64504
May 26, 2009

Photo of two stunner units located at the Parts Room. Photo taken facing north.

Photo 18

Michael J. Martin *MJM*



Triumph Foods
St. Joseph, MO 64504
May 26, 2009

Photo of two ½ full red five gallon container of spent alkaline batteries and spent nickel cadmium batteries (not labeled as “Universal Waste – Batteries,” “Waste Batteries”, or “Used Batteries”) located at the PPE Room. Photo taken facing east.

Photo 19

Michael J. Martin *MJM*